

# EXHIBIT A

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0001	FLO-00106857_0001 through FLO-00106857_0019		Excel file	HC-AEO	Flo Custodian for Authentication	Proof of total number of users and resulting damages.	Lorin Hitt	Relevant to defending Plaintiffs' CIPA 632 claim	-		Relevance; MIL  By Google & Meta: Hearsay; Personal Knowledge  By Google: Authenticity  By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0002	GOOG-FLO-00095198 through GOOG-FLO-00095202	7/6/2023	print-out of https://flo.health		Google Custodian for Authentication	Proof of Flo's liability for breach of contract and CMIA claim.					Relevance; Hearsay; Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).
0003	FLO-00003359 through FLO-00003362	Unknown	Frequently Asked Questions - Flo Customer Support.pdf		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract and CMIA claim.	R. Bugaev; L. Lydon	To provide relevant information about the Flo app and to rebut Plaintiffs' claims and request for damages.	Not relevant to any claim or defense	Relevant to showing the various features of the app and ways in which users can interact with the app, which in turn are relevant to rebutting Plaintiffs' claims	Relevance  By Meta: Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.
0004	FLO-00101059 through FLO-00101104	Unknown	Translated Conversation with Dmitry Gursky		Dmitry Gursky	Proof of Flo's liability for CMIA claim.					Relevance; Hearsay; No Certified Translation  By Meta: Probative Value Outweighed; Character; Authenticity; Personal Knowledge; MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)  The MIL is opposed.  Will present certified translation and/or translator as a witness.
0005	n/a	5/3/2024	Flo App Analysis Report of S. Egelman, Ph.D.	n/a	Serge Egelman	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.	S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping; Expert Cross-Examination	-		Improper Expert Opinion; MIL; Hearsay; Relevance; Personal Knowledge; Character; Inadmissible Expert Report; Original Required	Proper expert opinion/report. <i>See</i> ECF No. 597  MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
0006	FLO-00001891 through FLO-00001899	Unknown	iPhone screen shots of Flo app intake screens		Flo Custodian for Authentication	Proof of Flo's liability for CMIA and invasion of privacy; proof of Google and Meta's liability for CIPA.					Relevance; MIL; Probative Value Outweighed  By Google & Meta: Hearsay; Personal Knowledge  By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).

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0007	FLO-00001885 through FLO-00001890	n/a	Flo Deprecated Dictionary for Custom Events	HC-AEO	Flo Custodian for Authentication; Susanne Schumacher	Proof of Flo's liability for CMIA, breach of contract, and invasion of privacy; proof of Google and Meta's liability for CIPA.		Relevant to Damages, Relevant to Absence of Eavesdropping, Relevant Background	-		Relevance; MIL; Probative Value Outweighed  By Google & Meta: Hearsay; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0008	FLO-00001885	Unknown	G: Susanne Schumacher Depo Tr Vol. 1 - Ex. 147 (HC-AEO) P: Chart of Flo Data Shared with Third Parties	HC-AEO	Flo Custodian for Authentication; Susanne Schumacher	Proof of Flo's liability for CMIA, breach of contract, and invasion of privacy; proof of Google and Meta's liability for CIPA.					Relevance; MIL; Probative Value Outweighed  By Google & Meta: Hearsay; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0009	n/a	6/28/2024	Expert Rebuttal Report of S. Egelman, Ph.D.	n/a	Serge Egelman	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.	S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping; Expert Cross-Examination	-		Improper Expert Opinion; Hearsay; Relevance; MIL; Personal Knowledge; Inadmissible Expert Report; Original Required	Proper expert opinion. <i>See</i> ECF No. 597  MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
0010	FLURRY_FRASCO_000 460 through FLURRY_FRASCO_000 468	6/17/2016	Flurry "iOS SDK Instructions"		Bisera Ferrero; Nathalie Owen	Proof of Flo's liability for CMIA, breach of contract, and invasion of privacy.					Relevance; Hearsay; Authenticity; Personal Knowledge; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0011	GOOG-FLO-00037788 through GOOG-FLO-00037789	Unknown	"Get Started with Google Analytics for Unity" on the Firebase website		Google Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be establishes ( <i>see</i> Rules 201, 602, 901, 902); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901)
0012	META-FRASCO-0000027936 through META-FRASCO-0000027943	Unknown	Facebook Ads Tool "Solutions Guide"	Confidential	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Hearsay  By Flo: Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901).
0013	META-FRASCO-0000002971 through META-FRASCO-0000002975	Unknown	"Facebook App Events"	n/a	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay  By Flo: Relevance; Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); the exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901).
0014	GOOG-FLO-00077646 through GOOG-FLO-77647	Unknown	Google Analytics > Measurement > Android > "Log Events"	HC-AEO	Google Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be establishes ( <i>see</i> Rules 201, 602, 901, 902); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901)
0015	FLURRY_FRASCO_000 102 through FLURRY_FRASCO_000 105	7/8/2022	https://developer.yahoo.com/fl- umy/docs/analytics/ gettingstnted/ events/ android/ "Custom Events with Flurry Analytics for Android"		Flurry Custodian for Authentication	Proof of Flo's liability for CMIA, breach of contract, and invasion of privacy.					Relevance; Hearsay; Personal Knowledge; Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Balance favors admissibility (see Rules 401, 403).

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0016	META-FRASCO-0000003019 through META-FRASCO-0000003020	Unknown	"Facebook App Events Overview An overview of the app events in Facebook Analytics# Facebook App Events"	n/a	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay  By Flo: Relevance; Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); the exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901).
0017	FLURRY_FRASCO_000046 through FLURRY_FRASCO_000051	7/8/2022	https://developer.yahoo.com/fluny/docs/analytics/lexicon/eventsbestpractice/#fluny-custom-events-best-practices "Flurry Custom Events: Best Practices"		Flurry Custodian for Authentication	Proof of Flo's liability for CMIA, breach of contract, and invasion of privacy.					Relevance; Hearsay; Personal Knowledge; Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Balance favors admissibility (see Rules 401, 403)
0018	GOOG-FLO-00019736 through GOOG-FLO-00019739	6/11/2020	Email chain between Google and FTC	Confidential	Brian Kennedy; Morgan Kennedy	Proof of Defendants' liability for violation of CMIA, CIPA, breach of express contract, and/or invasion of privacy/intrusion upon seclusion; proof rebutting Defendants' affirmative defenses					MIL; Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed  By Flo: Authenticity	The MIL is opposed; the exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); balance favors admissibility (see Rules 401, 403); exhibit will be properly authenticated (see Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0019	META-FRASCO-0000003379 through META-FRASCO-0000003383	2/15/2019	Email chain between Facebook and Wall Street Journal	Confidential	KatyDormer; Susan Glick	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; Proof rebutting Defendants' affirmative defenses.					MIL; Personal Knowledge; Hearsay  By Flo: Authenticity; Relevance  By Meta: Probative Value Outweighed; Character	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902);not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); the exhibit is relevant (see Rules 401, 402); (re: probative value) balance favors admissibility (see Rules 401, 403); not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
0020	META-FRASCO-0000001147 through META-FRASCO-0000001148	12/13/2019	Meta's Response to FTC's November 7, 2019 Civil Investigative Demand, dated December 13, 2019	HC-AEO	Meta Custodian for Authentication; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					MIL; Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Cumulative / Duplicative  By Flo: Authenticity  By Meta: Character	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); the exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901); (re: probative value) balance favors admissibility (see Rules 401, 403); not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
0021	n/a	4/20/2023	Defendant Google's Fourth Supplemental Responses to Plaintiffs' Interrogatories, Set One, dated April 20, 2023		Kevin Lam	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					By Flo: Authenticity  By Flo & Meta: Relevance; Personal Knowledge; Hearsay; MIL	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The MIL is opposed.
0022	FLURRY_FRASCO001008_0001 through FLURRY_FRASCO001008_0199	Unknown	Chart showing Flo data sent to Flurry		Flurry Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy.					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity; MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0023	FLURRY_FRASCO001009_0001 through FLURRY_FRASCO001009_0090	Unknown	Chart showing Flo data sent to Flurry		Flurry Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy.					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity; MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.

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0024	META-FRASCO-0000001167	12/4/2019	Summary of App Events Sent from the Flo Health App (App ID 1478610232441385) to Facebook (December 9, 2017 through December 4, 2019), as of December 4, 2019	HC-AEO	Meta Custodian for Authentication	Proof of Plaintiffs' damages claims  Proof of Defendants' liability for breach of contract, CMLA, CIPA, invasion of privacy.					MIL; Probative Value Outweighed; Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity	Balance favors admissibility (see Rules 401, 403); The exhibit is relevant (see Rules 401, 402); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901).
0025	FLO-00072765	9/17/2018	Russian to English Translation of internal Flo email chain about Apps Flyer and Google Analytics		Roman Bugaev; Max Scrobov; Vladislav Zhukov	Proof of Flo's liability for breach of contract, CMLA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Hearsay; Probative Value Outweighed; MIL  By Flo: No certified translation  By Google & Meta: Personal Knowledge  By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Will present certified translation and/or translator as a witness.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0026	FLO-00072766	9/17/2018	Russian to English Translation of internal Flo email chain about "Feed Analytics" "events on Android" for the "iOS team" and the "contract with P&G."		Roman Bugaev; Max Scrobov; Vladislav Zhukov	Proof of Flo's liability for breach of contract, CMLA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Hearsay; Probative Value Outweighed; MIL  By Flo: No certified translation  By Google & Meta: Personal Knowledge  By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Will present certified translation and/or translator as a witness.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0027	FLO-00072768	9/14/2018	Russian to English Translation of internal Flo email chain about events for Google Analytics		Roman Bugaev; Darya Palianskaya	Proof of Flo's liability for breach of contract, CMLA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Hearsay; Probative Value Outweighed; MIL  By Flo: No certified translation  By Google & Meta: Personal Knowledge  By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Will present certified translation and/or translator as a witness.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0028	FLO-00105126	12/31/2019	Russian to English Translation of KPMG spreadsheet about Flo Health and P&G prepared for year end Dec. 31, 2019		Orlova, Tamara	Proof of Flo's liability for breach of contract, CMLA, and invasion of privacy.					Relevance; Hearsay; Probative Value Outweighed; MIL  By Flo: No certified translation  By Google & Meta: Personal Knowledge  By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0029	n/a	9/14/2022	Flo Health Inc.'s Responses and Objections to Plaintiffs' First Set of Interrogatories, dated September 14, 2022		Susanne Schumacher	Proof of Flo's liability for breach of contract, CMLA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.					Hearsay; Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0030	FLO-00001902 through FLO-00001906	3/29/2019	Wilson Sonsini letter to NYS DFS "Re: February 27, 2019 Letter to Flo Health, Inc.," dated March 29, 2019		Flo Custodian for Authentication NYSDFS Representative	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					Relevance; Probative Value Outweighed; MIL  By Google & Meta: Hearsay; Personal Knowledge  By Google: Authenticity  By Meta: Completeness	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Contains all parts that in fairness ought to be considered at the same time.
0031	FLO-00001929 through FLO-00001934	9/18/2019	Letter to FTC "Re: Supplemental Response to Civil Investigative Demand FTC Matter No. 1923133"		Flo Custodian for Authentication FTC Representative	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					MIL; Relevance; Probative Value Outweighed; Cumulative / Duplicate  By Google & Meta: Hearsay; Personal Knowledge  By Meta: Completeness	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Contains all parts that in fairness ought to be considered at the same time.  Exhibit is not cumulative or duplicative.
0032	FLO-00072422 through FLO-00072437	4/8/2019	Flo email chain with Bayer "Re: Bayer/Flo: analytical tools usage"		Roman Bugaev; Arvid Vismont	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.					Relevance; Probative Value Outweighed  By Google & Meta: Hearsay; Personal Knowledge  By Google: Authenticity  By Meta: Character	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609).
0033	n/a	1/30/2023	Defendant Meta Platforms, Inc.'s Supplemental Responses and Objections to Plaintiffs' Interrogatory Nos. 1, 9, and 11, dated January 30, 2023		Tobias Wooldridge	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's liability for CIPA.					Hearsay; MIL; Duplicative of P 165, P 193, P 198  By Flo & Meta: Relevance  By Flo: Personal Knowledge, Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0034	META-FRASCO-0000025148 through META-FRASCO-0000025205	6/28/2019	[IDFA Ranking Model Resilience 2019 H1 Retro] Part 1 - Overview, Impact, Challenges, Results, Limitations, and Future Directions"	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay; Personal Knowledge; Probative Value Outweighed; MIL  By Flo: <del>MIL</del> Authenticity	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); MIL is opposed; Exhibit will be properly authenticated (see Rule 901).
0035	META-FRASCO-0000001149 through META-FRASCO-0000001153	12/13/2019	Meta's Response to FTC's November 7, 2019 Civil Investigative Demand, dated December 13, 2019	HC-AEO	Meta Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's liability for CIPA.					MIL; Relevance; Personal Knowledge; Hearsay; Cumulative / Duplicative  By Flo: Authenticity  By Meta: Probative Value Outweighed; Character	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Balance favors admissibility (see Rules 401, 403).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609).  Not duplicative/cumulative.

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0036	GOOG-FLO-00082872 through GOOG-FLO-00082889	7/23/2019	Translation of e-mails in Russian (July 23, 2019-September 17, 2019) between Google (Maria Volchenok, Nikita Strelnikov) and Flo (Anna Kitaevskaya, Evgenia Olerinskaya, Kseniya Kurchych) re Flo's Google Ads	HC-AEO	Evgenia Olerinskaya; Maria Volchenok; Anna Kitaevskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Personal Knowledge; Hearsay  By Flo: Authenticity; No Certified Translation; Original Required  By Google: Relevance	Foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); will present certified translation and/or translator as a witness; document is original or exception applies ( <i>see, e.g.,</i> Rules 1003, 1004, 1007); exhibit is relevant ( <i>see</i> Rules 401, 402)
0037	GOOG-FLO-00090971 through GOOG-FLO-00090981	11/8/2018	Internal Google email chain "Re: [XP_UID] Gold XP_UID on the GA Mobile App" set of protections we can put in place that makes that go away."	HC-AEO	Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901)
0038	GOOG-FLO-00092676 through GOOG-FLO-00092678	Unknown	Firebase Auth & Google Analytics for Firebase	HC-AEO	Steve Ganem; Kevin Lam	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; proof to rebut affirmative defenses.					Relevance; Personal Knowledge; Hearsay  By Flo & Meta: Probative Value Outweighed  By Flo: Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0039	n/a	1/4/2023	Plaintiff Autumn Meigs' Supplemental Responses and Objections to Defendant Flo Health Inc.'s Interrogatories		Autumn Meigs	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			Hearsay; Personal Knowledge  By Flo & Meta: Relevance (partial)  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0040		1/19/2023	Plaintiff Erica Frasco's Supplemental Responses and Objections to Defendant Flo Health Inc.'s Interrogatories		Erica Frasco	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			Hearsay; Personal Knowledge  By Flo & Meta: Relevance (partial)  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0041		1/18/2023	Plaintiff Jennifer Chen's Supplemental Responses and Objections to Defendant Flo Health, Inc.'s Interrogatories	Confidential	Jennifer Chen	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay; Personal Knowledge  By Flo & Meta: Relevance (partial)  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0042		1/31/2023	2023-01-31 Sarah Wellman's Amended Supplemental R&Os to Flo ROGs (Confidential)	Confidential	Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay; Personal Knowledge  By Flo & Meta: Relevance (partial)  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0043		1/23/2023	2023-01-23 Tesha Gamino's Supplemental R&Os to Flo Health's ROGs (Confidential)	Confidential	Tesha Gamino	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay; Personal Knowledge  By Flo & Meta: Relevance (partial)  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0044	FLO-00049071 through FLO-00049109	Unknown	Plaintiff Chen's Flo App logged information with Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0045	FLO-00016295 through FLO-00016379	Unknown	Plaintiff Frasco's Flo App logged information with Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0046	FLO-00028110 through FLO-00028197	Unknown	Plaintiff Gamino's Flo App logged information with Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0047	FLO-00016381 through FLO-00016509	Unknown	Plaintiff Meigs's Flo App logged information with Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0048	FLO-00028102 through FLO-00028109	Unknown	Plaintiff Wellman's Flo App logged information with Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0049	FLO-00049111 through FLO-00057221	Unknown	Plaintiff Chen's Flo App Data sent to Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0050	FLO-00004576 through FLO-00016294	Unknown	Plaintiff Frasco's Flo App Data sent to Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0051	FLO-00028199 through FLO-00049070	Unknown	Plaintiff Gamino's Flo App data sent to Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0052	FLO-00016510 through FLO-00025623	Unknown	Plaintiff Meigs's Flo App Data sent to Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0053	FLO-00026002 through FLO-00028101	Unknown	Plaintiff Wellman's Flo App Data sent to Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL  By Google & Meta: Authenticity  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0054	META-FRASCO-0000028530	5/4/2018	"Signals FY1 . . . # Data Retention & Controls Update 5/4 Here is an overview of various offsite data retention and controls related work streams to be aware of. . ."	HC AEO	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay; Personal Knowledge  By Flo & Meta: Relevance  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); Exhibit will be properly authenticated (see Rule 901).
0055	n/a	6/27/2022	Defendant Flurry LLC's Objections and Responses to Plaintiffs' First Set of Interrogatories, dated June 27, 2022		Bisera Ferrero	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy.					Relevance; Personal Knowledge; Authenticity; Hearsay; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0056	FLO-00094934	Unknown	Russian to English Translation of "Integration requirements for Amplitude" list		Max Scrobov	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy.					MIL; Relevance; Hearsay  By Flo: No Certified Translation; Original Required; Subsequent Remedial Measures	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.  Not subsequent remedial measures and/or exception applies (see Rule 407).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
0057	FLO-00095249 through FLO-00095279	1/1/2020	"Flo Monthly Reporting"		Tamara Orlova	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.					Relevance; MIL	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).
0058	FLO-00025650 through FLO-00025653	4/20/2021	"MINUTES OF A REGULAR MEETING OF THE BOARD OF DIRECTORS OF FLO HEALTH, INC."		Flo Custodian for Authentication	Proof of damages.					Relevance  By Flo: MIL	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).
0059	FLO-00025778 through FLO-00025829	6/16/2021	"Flo Health Group Consolidated Financial Statements as at and for the year ended 31 December 2020" by KPMG		Flo Custodian for Authentication	Proof of damages.					Relevance  By Flo: MIL	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0060	GOOG-FLO-00081317 through GOOG-FLO-00081318	2/20/2019	Russian to English Translation of email chan "[FLO] Re: FLO / Google meeting follow-up"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo & Meta: Authenticity; Original Required	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); document is original or exception applies ( <i>see, e.g.,</i> Rules 1003, 1004, 1007)
0061	GOOG-FLO-00081575 through GOOG-FLO-00081600	Unknown	"FLO // Google 2019 Plan Proposal - Executive Summary" PPT	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity; MIL	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); the MIL is opposed
0062	META-FRASCO-0000001218 through META-FRASCO-0000001238	9/10/2019	Flo/ Facebook email chain "Re: New Facebook Account Manager for Flo Health"	HC-AEO	Brianna Arroyo	Proof of Plaintiffs' damages claims; Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Hearsay  By Flo: Personal Knowledge; Authenticity; MIL	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0063	META-FRASCO-0000021055 through META-FRASCO-0000021060	2/27/2020	Email chain: "Subject: Re: Urgent issues on Facebook."	Confidential	Alex Bagdasarov	Proof of Plaintiffs' damages claims; Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Hearsay  By Flo: Personal Knowledge; Authenticity  By Meta: Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); MIL opposed.
0064	GOOG-FLO-00081659-81659	5/29/2019	[3-6316000026511] Advertiser - FLO, Health & Fitness category, period tracker; Markets - US; (Case 3-6316000026511)"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo & Meta: Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0065	GOOG-FLO-00084738-84740	9/23/2020	Email chain "Re: [0-0512000030037] - Personalized Ads policy - 807-232-5127"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0066	META-FRASCO-0000001157	12/13/2019	Meta's Response to FTC's November 7, 2019 Civil Investigative Demand, dated December 13, 2019	HC-AEO	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; Proof rebutting Defendants' affirmative defenses					MIL; Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity  By Google & Meta: Probative Value Outweighed  By Meta: Character; Cumulative / Duplicative	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); Not duplicative.
0067	n/a	5/3/2024	Expert Report of Jennifer Golbeck, dated May 3, 2024.		Jennifer Golbeck	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorization.					Hearsay; Improper Expert Opinion; Inadmissible Expert Report; Original Required	Proper expert opinion/report. See ECF No. 597  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
0068	GOOG-FLO-00088918 through GOOG-FLO-00088924	9/11/2018	GOOG-FLO-00088918	HC-AEO	Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.	S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo: Personal Knowledge; Authenticity; Hearsay; Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); exhibit will be properly authenticated ( <i>see</i> Rule 901); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception ( <i>see</i> Rules 803, 804, 807); balance favors admissibility ( <i>see</i> Rules 401, 403), the exhibit is relevant (Rules 401, 402)
0069	GOOG-FLO-00078297 through GOOG-FLO-00078300	10/20/2020	"Re: Mobile [8-7303000031030] Campaign is only serving text assets"	HC-AEO	Maria Volchenok	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity; MIL	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); the MIL is opposed
0070	GOOG-FLO-00064255 through GOOG-FLO-00064278	3/20/2020	GA4F SDK-'. AC Comm doc "Project Uno"	HC-AEO	Steve Ganem; Kevin Lam	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Personal Knowledge; Hearsay  By Flo: Authenticity  By Google: Relevance	Foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); the exhibit is relevant ( <i>see</i> Rules 401, 402)
0071	FLO-00003020 through FLO-00003023	6/15/2016	Flo Health Privacy Policy 6-15-2016 (FLO-00003020)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	Agreed	N/A	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0072	FLO-00003046 through FLO-00003052	11/15/2016	Flo Health Privacy Policy 11-15-2016(FLO-00003046)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0073	FLO-00002816 through FLO-00002822	12/21/2016	Flo Privacy Policy (archived), effective as of December 21, 2016	n/a	Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0074	FLO-00002942 through FLO-00002947	3/14/2017	OwHealth, Inc. Privacy Policy, effective as of March 14, 2017	Confidential	Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorization.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-		Agreed	N/A
0075	FLO-00002948 through FLO-00002953	3/17/2017	Flo Health Privacy Policy 3-17-2017 (FLO-00002948)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0076	FLO-00002779 through FLO-00002785	7/12/2017	Flo Health Privacy Policy 7-12-2017 (FLO-00002779)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0077	FLO-00003039 through FLO-00003045	8/28/2017	Flo Health Privacy Policy, effective as of August 28, 2017	Confidential		Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-		Looks duplicative of Frasco 147 which we suggest using to keep with deposition exhibit numbers and would agree to admissibility for.	
0078	FLO-00002969 through FLO-00002975	11/13/2017	Flo Health Privacy Policy 11-13-2017 (FLO-00002969)			Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-		Looks duplicative of Ridgway 85 which we suggest using to keep with deposition exhibit numbers and would agree to admissibility for.	
0079	FLO-00002803 through FLO-00002815	5/25/2018	OwHealth, Inc. Privacy Policy, effective as of May 25, 2018	Confidential		Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-		Looks duplicative of Gamino/Ridgway 29 which we suggest using to keep with deposition exhibit numbers and would agree to admissibility for.	
0080	FLO-00003007 through FLO-00003019	7/16/2018	Flo Privacy Policy, effective as of July 16, 2018	Confidential		Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Looks duplicative of Wellman 66 which we suggest using to keep with deposition exhibit numbers and would agree to admissibility for.	
0081	FLO-00097992 through FLO-000098004	8/6/2018	Flo Health Privacy Policy 8-6-2018 (FLO-00002877)		Flo Health Custodian for Authentication; Timofei Savitski	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0082	FLO-00003024 through FLO-00003038	2/19/2019	Flo Privacy Policy, effective as of February 19, 2019		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0083	FLO-00002976 through FLO-00002988	2/23/2019	Flo Health Privacy Policy 2-23-2019 (FLO-00002976)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0084	FLO-00002749 through FLO-00002761	2/27/2019	Flo Health Privacy Policy 2-27-2019		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizaioin.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0085	FLO-00098363 through FLO-000098364	9/27/2018	Email from Flo Support to strl3012@byui.edu re Question on Private Policy	Confidential	Valeriya Silenkova	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	Flo Witness	Relevant to Consent, Relevant to License Defense	-		By Flo: Personal Knowledge; Hearsay; Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0086		6/17/2021	Complaint, In the Matter of Flo Health Inc., FEDERAL TRADE COMMISSION, No. 1923133 <a href="https://www.ftc.gov/system/files/documents/cases/flo_health_complaint.pdf">https://www.ftc.gov/system/files/documents/cases/flo_health_complaint.pdf</a>		FTC Representative Flo Representative	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.					MIL; Relevance; Probative Value Outweighed; Hearsay; Personal Knowledge  By Flo: Authenticity  By Meta: Character	The MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)
0087	GOOG-FLO-00057395 through GOOG-FLO-000057396	6/19/2019	Re: Firebase / S2S instead of SDK / FLO	HC-AEO	Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; proof of damages, including punitive.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0088	GOOG-FLO-00057418 through GOOG-FLO-000057420	6/25/2019	"Re: Firebase / S2S instead of SDK / FLO"	HC-AEO	Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; proof of damages, including punitive.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0089	META-FRASCO-0000001171 through META-FRASCO-0000001173	3/12/2019	Flo email chain "Re: Should CO3BOHMTbC51"	Confidential	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Personal Knowledge; Relevance  By Flo & Meta: Hearsay; No Certified Translation; MIL  By Flo: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Will present certified translation and/or translator as a witness; MIL is opposed; Exhibit will be properly authenticated (see Rule 901).
0090	META-FRASCO-0000004236 through META-FRASCO-0000004237	5/11/2020	"Message summary [{"otherUserFbId": null, "threadFbId":2347242988712092}]"	HC-AEO	Julia Onuchina	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay; Probative Value Outweighed; Personal Knowledge; Relevance  By Flo: Authenticity  By Meta: Character	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Balance favors admissibility (see Rules 401, 403; Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); Exhibit will be properly authenticated (see Rule 901); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
0091	FLO-00106587 through FLO-0000106589	4/17/2023	FTC notice release process, <a href="https://ow.health.atlassian.net/wiki/pages/viewpage.action?pageId=3404136520&amp;pageVersion=2">https://ow.health.atlassian.net/wiki/pages/viewpage.action?pageId=3404136520&amp;pageVersion=2</a>		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google; rebutting affirmative defenses.					Relevance; Personal Knowledge; MIL; Probative Value Outweighed  By Google & Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is opposed.  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0092	FLO-00104570 through FLO-0000104573	3/13/2017	OwHealth, Inc. Terms of Service, published March 13, 2017 (and in effect through July 11, 2017)	n/a	Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof rebutting Defendants' affirmative defenses	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to Consent, Relevant to License Defense	-		Agreed	
0093	FLO-00104580 through FLO-0000104585	11/15/2017	Flo Terms of Service, published November 15, 2017 (and in effect through November 27, 2017)	n/a	Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof rebutting Defendants' affirmative defenses	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to Consent, Relevant to License Defense	-		Agreed	
0094	FLO-00067608 through FLO-000067639	Unknown	Flo PPT: "The World's First AI-Powered Super App"		Sergey Vasilyev; Roman Bugaev	Proof of Flo's liability for CMIA and invasion of privacy; proof of damages.					Relevance; Hearsay  By Flo: MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The MIL is opposed.
0095	FLO-00076557 through FLO-000076565	Unknown	Flo Longterm Subscriptions (1).pdf		Tamara Orlova	Proof of Flo's liability for CMIA, invasion of privacy, and breach of contract; proof of damages.					Relevance; MIL  By Flo: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.
0096	FLO-00106148 through FLO-0000106150	10/12/2020	Flo (Ow Health) "Your Monthly Debrief: Dr. Staci T on Birth Control, Most Popular Community Discussions, Menstrual Cycle Length Research"		Flo Custodian for Authentication	Proof of Flo's liability for CMIA.					Relevance, Probative Value Outweighed, MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.
0097	GOOG-FLO-00072497 through GOOG-FLO-000072499	Unknown	Google Analytics Help "About Demographics and Interests"	HC-AEO	Google Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0098	GOOG-FLO-00082938 through GOOG-FLO-000082939	9/28/2019	"Remarketing lists disabled for use with Google Ads"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0099	GOOG-FLO-00090263 through GOOG-FLO-000090278	3/18/2020	Internal Google email chain "Re: [fateat-taxonomic] fork: Implementation of sensitive iba in UAM"	HC-AEO	Ben Ewing	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; rebutting affirmative defenses.					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0100	META-FRASCO-0000021051 through META-FRASCO-0000021054	2/27/2020	certified translation of the document bates stamped META-FRASCO-0000021051 showing internal Flo email chain "Re: Urgent questions regarding how does facebook work"	Confidential	Alex Bagdasarov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay  By Flo: Personal Knowledge; Authenticity; No Certified Translation; Original Required  By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Will present certified translation and/or translator as a witness; Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007); Balance favors admissibility (see Rules 401, 403).
0101	META-FRASCO-0000407127 through META-FRASCO-00000407200	12/20/2019	certified translation of the document bates stamped META-FRASCO-0000407127 showing a chat between Eugene Tiunovich (Flo) and Alex B.	Confidential	Alex Bagdasarov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses; Proof of Plaintiffs' damages claims					Relevance, Hearsay  By Flo: Personal Knowledge; Authenticity; No Certified Translation; Original Required  By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Will present certified translation and/or translator as a witness; Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007); Balance favors admissibility (see Rules 401, 403).
0102	META-FRASCO-0000369781 through META-FRASCO-0000369784	Unknown	Identity Matching in Layman's Terms <a href="https://www.internafib.com/internwiki/Identity-Matching/Identity-Business-Overview/">https://www.internafib.com/internwiki/Identity-Matching/Identity-Business-Overview/</a>	HC-AEO	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Probative Value Outweighed, Personal Knowledge  By Flo: Authenticity; Hearsay	The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0103	GOOG-FLO-00061014 through GOOG-FLO-00061019	11/1/2019	Firebase 2020 Strategy & Priorities	HC-AEO	Steve Ganem; Kevin Lam	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0104	META-FRASCO-0000027597 through META-FRASCO-0000025801	8/10/2017; last edited 11/29/2017	App Signal Strategy & H2 2017 Roadmap	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0105	META-FRASCO-0000027855 through 0000027859	Jul-19	Facebook, Business Tools Security Guide	Confidential	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses	Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; O. Bagdasarov	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Personal Knowledge  By Flo: Hearsay; Authenticity; Relevance  By Meta: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0106	META-FRASCO-0000000107 through 0000000113	Unknown	APP Events FAQ	n/a	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Personal Knowledge  By Flo: Hearsay; Authenticity; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0107	Flo-00001924 through 00001928	11/12/2019	Flo's letter to FTC re: Supplemental Response to Civil Investigative Demand (FTC Matter No. 1923133)		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					Relevance, Probative Value Outweighed, Personal Knowledge; MIL  By Google & Meta: Hearsay  By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).
0108	META-FRASCO-0000023770 through 0000023805	End of 2021	AI for Ads MZ Deep Dive – Privacy Section	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity  By Meta: Probative Value Outweighed; Completeness; Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Complete; Not subsequent remedial measures and/or exception applies (see Rule 407).
0109	META-FRASCO-0000028537	2/28/2019	Document titled "Facebook Analytics (Deprecated Product) Q&A and Feedback"	HC AEO	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance, Hearsay  By Flo: Authenticity; Personal Knowledge  By Meta: Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); the MIL is opposed.
0110	META-FRASCO-0000022438 through 0000022470	7/16/2020 (last edited)	Meta Workplace post "High Risk Health Metadata Prevalence Deep Dive" (last edited by Michelle Chen on July 16, 2020)	HC-AEO	Michelle Chen; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity  By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403).
0111	META-FRASCO-0000026472 through 0000026483	4/2/2019	Privacy Enhancements to FB SDK - S&I Review (4/2/19)"	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay  By Flo: Authenticity; Personal Knowledge  By Meta: Probative Value Outweighed; Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); Not subsequent remedial measures and/or exception applies (see Rule 407).
0112	META-FRASCO-0000406740 through 0000406744	4/2/2018	Internal Facebook messages	Confidential	Anh Bui	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay  By Flo: Authenticity; Personal Knowledge  By Meta: Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); MIL is opposed.



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0113	META-FRASCO-0000003606	5/17/2019	Internal Facebook messages	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity  By Meta: Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); MIL is opposed.
0114	META-FRASCO-0000028913 through 0000028918	2/20/2019	Internal Facebook emails	Confidential	Victoria Chen Norland	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay  By Flo: Authenticity; No Certified Translation; Probative Value Outweighed; Personal Knowledge  By Meta: Probative Value Outweighed; Non-certified Translation; Character	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Will present certified translation and/or translator as a witness; Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
0115	META-FRASCO-0000027524 through 0000027528	6/8/2018	Facebook's June 8, 2018 Answers to Senate Committee Questions	n/a	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					By Flo & Meta: Hearsay; MIL; Relevance  By Flo: Authenticity; Personal Knowledge  By Meta: Probative Value Outweighed; Character; Cumulative / Duplicative of P 332	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); MIL is opposed; The exhibit is relevant (see Rules 401, 402); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); not duplicative
0116	META-FRASCO-0000002161	11/23/2018	Email from A. Lapitski to M. Shaternik re Subscribe Events Set up	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses	A. Lapitski	Relevant to Absence of Eavesdropping	-		By Flo: Hearsay; Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0117	META-FRASCO-0000024793	11/23/2018	Email (in russian) between Flo and Meta re: Subscribe Events Set up	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Interpreter  By Flo: Hearsay; Authenticity; Relevance; Probative Value Outweighed; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902). Will present certified translation and/or translator as a witness.
0118	META-FRASCO-0000024794	11/23/2018	Emails between Flo and Facebook re: Subscribe Events Set up	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Interpreter, Hearsay, Authenticity  By Flo: Personal Knowledge; Relevance  By Meta: Probative Value Outweighed	Will present certified translation and/or translator as a witness. Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0119	META-FRASCO-0000024816 through 0000024820	1/14/2019	Emails between Flo and Facebook re: Update to Your Facebook Support	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity  By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403).
0120	META-FRASCO-0000007890 through 0000007892	5/21/2019	Email between Flo and Facebook re: Facebook Client Solutions Manager	Confidential	Alex Lapitski; Julia Onuchina	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay  By Flo: Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0121	FLO-00094771 through FLO-00094772	12/20/2018	Email notice from Meta to Flo – fwd: Important notice from Facebook Integrity team		Max Scrobov; Maksim Shaternik	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					Relevance, Probative Value Outweighed  By Flo: Hearsay  By Meta: Personal Knowledge; MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is opposed.

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0122	FLO-00072710	1/6/2019	Email notice from Meta to Flo – Important notice from Facebook Integrity team		Roman Bugaev	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					Relevance, Probative Value Outweighed  By Flo: Hearsay  By Meta: Personal Knowledge; MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is opposed.
0123	META-FRASCO-0000406063 through 0000406064	3/5/2019	Facebook email chain Re: apple reaction after WSJ story	Confidential	Katy Dormer	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: Authenticity; Subsequent Remedial Measures; Personal Knowledge; Relevance; MIL  By Meta: Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Not subsequent remedial measures and/or exception applies (see Rule 407); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); MIL is opposed.
0124	META-FRASCO-0000001168 through 0000001170	3/5/2025	Translation of email chain between Meta and Flo re: To call		Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: Interpreter; Personal Knowledge; Best Evidence; Relevance  By Meta: Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Will present certified translation and/or translator as a witness; Balance favors admissibility (see Rules 401, 403); The exhibit is relevant (see Rules 401, 402). Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007).
0125	FLO-00094769	3/5/2025	Translation of 3/29/2019 email from Flo employee (Max Scrobov) to “Peter” re: “UA question”		Max Scrobov	Proof of damages, including punitive.					Probative Value Outweighed  By Flo: Relevance; Personal Knowledge; Interpreter; Best Evidence  By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present certified translation and/or translator as a witness.
0126	FLO-00101418 through 00101421	3/5/2025	Chat chain between Sergey Gonchar, Roman Bugaev, Aliaksei Staliarou, and Aliaksandr Karzhenka		Roman Bugaev	Proof of damages, including punitive.					Personal Knowledge  By Flo: Relevance; Probative Value Outweighed; Subsequent Remedial Measures  By Meta: Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0127	FLO-00066727 through 00066729	3/5/2025	Translation of 2/10/2020 internal Flo emails re: Follow-up with UA strategy & plans meeting		Roman Bugaev; Tamara Orlova; Max Scrobov; Dmitry Gurski	Proof of damages, including punitive.					Probative Value Outweighed  By Flo: Relevance; Personal Knowledge; Interpreter; Best Evidence	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or translator as a witness.
0128	META-FRASCO-0000003368 through 0000003374	2/22/2019	Sam Schechner and Mark Secada, <i>You Give Apps Sensitive Personal Information. Then They Tell Facebook</i> , Wall Street Journal (Feb. 22 2019 11:07 a.m. ET)	n/a	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay, Probative Value Outweighed  By Flo & Meta: Authenticity; Relevance; MIL; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Not subsequent remedial measures and/or exception applies (see Rule 407); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); MIL is opposed.



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0129	FLO-00003058 through 00003062	3/29/2019	Flo's Second response letter to Acting Superintendent of Financial Services Linda A. Lacewell re: Flo's sharing of information with Facebook		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					Relevance, Probative Value Outweighed, Hearsay, Personal Knowledge; MIL  By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).
0130	n/a	5/9/2023	Flo App Analysis Report of S. Egelman, Ph.D.	Confidential	Serge Egelman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping; Expert Cross-Examination	-		Hearsay; MIL; Improper Expert Opinion; Inadmissible Expert Report; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.  Proper expert opinion/report. See ECF No. 597.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0131	n/a	6/27/2023	Expert Rebuttal Report of S. Egelman, Ph.D.	n/a	Serge Egelman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping	-		Hearsay; MIL; Improper Expert Opinion; Inadmissible Expert Report	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.  Proper expert opinion/report. See ECF No. 597.
0132	n/a	2/12/2021	Class Action Complaint	n/a	Sarah Wellman	Rebutting Defendants' affirmative defenses.	Plaintiffs	Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility, Cross-Examination of the Named Plaintiffs			MIL; Personal Knowledge; Hearsay	MIL is opposed.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0133		10/20/2022	Plaintiff Sarah Wellman's Amended Objections and Responses to Defendants' First Set of Interrogatories to Plaintiff Sarah Wellman	Confidential	Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay  By Flo: Personal Knowledge; MIL; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).
0134		1/10/2023	Plaintiff Sarah Wellman's Amended Supplemental Responses and Objections to Defendant Flo Health, Inc.'s Interrogatories to Plaintiff Sarah Wellman	Confidential	Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay  By Flo: Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0135	FLO-WELLMAN-0000450	7/2/2021	Email from Flo to Sarah Wellman on July 2, 2021 titled "Important legal notice for users who used the app between June 30, 2016, and February 23, 2019, regarding our recent settlement with the FTC."		Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					Hearsay; MIL; Personal Knowledge; Relevance; Probative Value Outweighed  By Flo & Google: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0136		1/11/2023	Plaintiff Sarah Wellman's Responses and Objections to Defendant Google LLC's Interrogatories to Plaintiff Sarah Wellman		Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim	-		Hearsay  By Flo: Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0137	n/a	Unknown	"Google Search Terms" (a list of [73] search terms Plaintiff's counsel provided to Google)		Sarah Wellman						Relevance; MIL  By Flo: Probative Value Outweighed  By Google: Personal Knowledge; Hearsay	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0138	GOOG-FLO-00019507 through GOOG-FLO-00019534	5/25/2018	Google Privacy Policy (5/25/2018 Version)		Google Custodian for Authentication	Rebutting affirmative defenses.	S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo: Hearsay; Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be properly authenticated (see Rule 901); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); exhibit is relevant (see Rules 401, 402).
0139	GOOG-FLO-00019668 through GOOG-FLO-00019698	2/4/2021	Privacy Policy, GOOGLE, LLC (effective February 4, 2021)		Google Custodian for Authentication	Rebutting affirmative defenses.	S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			By Flo: Hearsay; Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be properly authenticated (see Rule 901); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); exhibit is relevant (see Rules 401, 402).
0140	FLO-00066600	1/11/2023	"Welcome to Flo" Terms of Use and Privacy Policy Agreement Page	Confidential	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract; to rebut affirmative defenses.	S. Schumacher; S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	-		Agreed	N/A
0141	n/a	6/22/2018	Flo Terms of Service, effective as of June 22, 2018	Confidential	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract; to rebut affirmative defenses.	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Agreed	N/A
0142	META-FRASCO-0000002715 through META-FRASCO-0000002724	4/19/2018	Facebook Data Policy, date of last revision April 19, 2018	Confidential	Meta Custodian for Authentication	To rebut affirmative defenses.	Plaintiffs; T. Wooldridge; G. Nebo; Perlman; B. Arroyo	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		By Flo: Hearsay; Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).
0143		10/20/2022	Plaintiff Tesh Gamino's Amended Objections and Responses to Defendants' First Set of Interrogatories to Plaintiff Tesha Gamino	Confidential	Tesha Gamino	Proof of Flo's liability for breach of contract, CMLA, and invasion of privacy; proof of Google and Meta's liability for CIPA.	T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay  By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0144	n/a	2/3/2021	Complaint, <i>Gamino v. Flo Health Inc.</i>	n/a	Jennifer Chen	Rebutting Defendants' affirmative defenses.	T. Gamino	Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility, Cross-Examination of the Named Plaintiffs	-		By Flo: Opinion Testimony; Hearsay; Personal Knowledge; MIL  By Meta: Probative Value Outweighed; MIL; Hearsay; Personal Knowledge	Not improper opinion testimony (Rule 701).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.
0145	n/a	9/2/2021	Consolidated Class Action Complaint	n/a	Sarah Wellman Erica Frasco	Rebutting Defendants' affirmative defenses.	Plaintiffs	Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility, Cross-Examination of the Named Plaintiffs	-		By Flo: Opinion Testimony; Hearsay; Personal Knowledge; MIL  By Meta: Probative Value Outweighed; MIL; Hearsay; Personal Knowledge	Not improper opinion testimony (Rule 701).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.
0146	GOOG-FLO-00019562 through GOOG-FLO-00019578	8/29/2016	Privacy Policy, GOOGLE, LLC (last modified August 29, 2016)		Google Custodian for Authentication	Rebutting Defendants' affirmative defenses.					By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).
0147	META-FRASCO-0000001118 through META-FRASCO-0000001140	11/7/2019	FTC Civil Investigative Demand to Meta [FTC File No. 1923133] issued on November 7, 2019	Confidential	Meta Custodian for Authentication; FTC Representative	Rebutting Defendants' affirmative defenses; proof of data deletion; proof of damages, including punitive.					Relevance, Probative Value Outweighed, Hearsay, Personal Knowledge; MIL  By Flo: Authenticity  By Meta: Character	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0148	n/a	10/31/2022	Defendant Meta Platforms, Inc.'s Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories, dated October 31, 2022		Anjali Dahiya Wei Lu Karan Shah	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's liability for CIPA.					Hearsay; Relevance  By Flo: Probative Value Outweighed; Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0149	META-FRASCO-0000000672 through META-FRASCO-0000000675	5/21/2018	Facebook Business Tools Terms, effective May 21, 2018	n/a	Meta Custodian for Authentication	Rebutting Defendants' affirmative defenses.	Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; J. Onuchina	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0150	META-FRASCO-0000006340 through META-FRASCO-0000006341	2/28/2019	E-mail from Caitlin O'Neill (US Public Policy) to Chris Herndon, Steve Satterfield, Anjali Dahiya on February 28, 2019 re "ROUGH NOTES - E&C phone briefing"	Confidential	Anjali Dahiya; Steve Satterfield; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Authenticity	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
0151	META-FRASCO-0000019653 through META-FRASCO-0000019654	2/22/2019	E-mail to Karissa Bell (Senior Tech Reporter, Mashable) from Meta (Nissa Anklesaria) on February 22, 2019 re comment on WSJ/Flo health?	n/a	Nissa Anklesaria; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay; Personal Knowledge  By Flo: Relevance; Probative Value Outweighed; Authenticity	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
0152	META-FRASCO-0000002226 through META-FRASCO-0000002232	6/11/2020	Facebook Business, "Good Questions and Real Answers: How does Facebook Use Machine Learning to Deliver Ads"	n/a	Meta Custodian for Authentication; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses	T. Wooldridge; W. Liu; F. Leach; J. Zheng; T. Frantsuzenko	Relevant to Absence of Eavesdropping	-		Relevance, Hearsay, Personal Knowledge; Probative Value Outweighed  By Flo: Authenticity	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
0153	META-FRASCO-0000019555 through META-FRASCO-0000019557	Unknown	"The Journey of an Ads Ranking Model" (Revision 721 03277)	HC-AEO	Meta Custodian for Authentication; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay, Personal Knowledge; Probative Value Outweighed  By Flo: Authenticity	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
0154	META-FRASCO-0000001089 through META-FRASCO-0000001092	1/10/2020	Meta's Response to FTC's November 7, 2019 Civil Investigative Demand, dated January 10, 2020	HC-AEO	Meta Custodian for Authentication; FTC Representative; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Probative Value Outweighed, Personal Knowledge, Hearsay; MIL  By Flo: Authenticity  By Meta: Character	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); MIL is opposed.
0155	META-FRASCO-0000008101 through META-FRASCO-0000008103	2/27/2019	Letter from NY DFS (Linda Lacewell, Acting Superintendent of Financial Services) to Meta (Mark Zuckerberg, CEO and Chairman, and Deborah Yee-Ky Liu, CEO) dated February 27, 2019	Confidential	Meta Custodian for Authentication; NYSDFS Representative; Tobias Wooldridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defense					Relevance, Probative Value Outweighed, Personal Knowledge, Hearsay; MIL  By Flo: Authenticity  By Meta: Character	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); MIL is opposed.
0156	n/a	2/18/2021	Report on Investigation of Facebook Inc. Data Privacy Concerns, N.Y. STATE DEP'T OF FIN. SERVS. (Feb. 18, 2021)	n/a	NYSDFS Representative; Tobias Wooldridge	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's liability for CIPA; rebutting affirmative defenses.					Relevance, Probative Value Outweighed, Personal Knowledge, Hearsay; MIL  By Flo: Authenticity  By Meta: Character	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0157	META-FRASCO-0000022416 through META-FRASCO-0000022419	8/26/2020	Meta Workplace post "% of web signals from prohibited sources" (Metric Update by Michelle Chen on August 26, 2020)	HC-AEO	Michelle Chen; Tobias Woolridge	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance, Probative Value Outweighed, Personal Knowledge, Hearsay  By Flo: Authenticity  By Meta: Subsequent Remedial Measures	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Not subsequent remedial measures and/or exception applies (see Rule 407).
0158	META-FRASCO-0000024968 through META-FRASCO-0000024980	2/28/2019	App Categorization, with Signals Integrity applications in mind (last updated February 28, 2019 by Hong Chun Leung)	HC-AEO	Wei Liu; Anh Bui	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay, Personal Knowledge; Relevance; Probative Value Outweighed  By Flo: Authenticity	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
0159	META-FRASCO-0000020292 through META-FRASCO-0000020387	1/11/2021 (last updated)	Meta, Internal Quip "Signals Primer"	HC AEO	Nissa Anklesaria; Anh Bui	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses	T. Wooldrige; A. Dahiya; A. Bui; G. Nebol-Perlman	Relevant to Absence of Eavesdropping	-		Hearsay, Personal Knowledge; Relevance; Probative Value Outweighed  By Flo: Authenticity	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
0160	META-FRASCO-0000406172	2/27/2019	Internal messages between Anh Bui and Hong Chun Leung re App Categorization	Confidential	Wei Liu; Anh Bui	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay, Personal Knowledge; Relevance; Probative Value Outweighed  By Flo: Authenticity	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
0161	n/a	5/9/2023	Expert Report of G. Zervas, Ph.D.	HC AEO	Georgios Zervas		G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0162	META-FRASCO-Zervas-00000061 through META-FRASCO-Zervas-00000066	n/a	Amazon, "Web Services titled Caching Overview"	n/a	Georgios Zervas		G. Zervas	Relevant to Absence of Eavesdropping	-		By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	
0163	n/a	6/27/2023	Expert Rebuttal Report of G. Zervas, Ph.D.	HC AEO	Georgios Zervas		G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0164	GOOG-FLO-00019535 through GOOG-FLO-00019544	12/18/2017	Google Privacy Policy (last modified December 18, 2017)		Google Custodian for Authentication	Rebutting Defendants' affirmative defenses.	L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	The exhibit is relevant (see Rules 401, 402); balance favors admissibility (Rule 403); not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be properly authenticated (see Rule 901); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902)
0165	FLO-00000267	Undated	OwHealth, Inc. Terms of Service	Confidential	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; rebutting affirmative defense	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense	-		Agreed	
0166	n/a	10/20/2022	Plaintiff Autumn Meigs' Amended Objections and Responses to Defendants' (Meta Platforms, Inc., Google LLC, and Flurry, LLC) First Set Of Interrogatories		Autumn Meigs	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.	A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			Hearsay; Personal Knowledge  By Flo & Meta: Relevance; Probative Value Outweighed; MIL  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).
0167	n/a	10/24/2022	Plaintiff Autumn Meigs' Verification of her (October 20, 2022) Amended Objections and Responses to Defendants' (Meta Platforms, Inc., Google LLC, and Flurry, LLC) First Set Of Interrogatories		Autumn Meigs	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.	A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			Hearsay  By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0168	FLO-00000212	Unknown	Flo Welcome Screen		Flo Custodian for Authentication	Rebutting affirmative defenses. Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			Agreed	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0169	n/a	5/9/2023	Analysis Report for Flo App Analysis Report of S. Egelman	n/a	Serge Egelman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.	S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping	-		Hearsay; Authenticity; Relevance; MIL; Inadmissible Expert Report; Probative Value Outweighed; Personal Knowledge; Improper Expert Opinion	
0170	n/a	5/1/2022	Flo Terms of Use, effective May 1, 2022	n/a			Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		By Google: Relevance; Personal Knowledge; Hearsay; Authenticity  By Meta: Relevance; Subsequent Remedial Measures	
0171	n/a	8/2/2023	AppCensus Terms of Service	n/a	Serge Egelman		S. Egelman	Relevant to Consent, Relevant to License Defense	-		By Flo & Google: Relevance; Personal Knowledge; Hearsay; Authenticity  By Flo: Probative Value Outweighed	
0172	META-FRASCO-0000028179	undated	Meta, "App Events Best Practice Guide"	n/a	Meta Custodian for Authentication; Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses	T. Wooldridge, A. Dahiya; W. Liu; A. Lapitski	Relevant to Absence of Eavesdropping	-		By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0173	META-FRASCO-0000406101 through META-FRASCO-0000406102	3/29/2018	Internal Meta messages (Stan Wu, Christina Xu, Liang Xu, Wei Liu, Yujing Wang, Li Zhou, Bo Zhu) re "crawling sensitive user data in SDK" on March 29, 2018	Confidential	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0174	META-FRASCO-0000406087	4/2/2018	Internal Meta Task by Christina Xu "Detect and filter sensitive user data in app_indexing endpoint"	Confidential	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay, Personal Knowledge  By Flo: Relevance; Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0175	META-FRASCO-0000026020 through META-FRASCO-0000026022	4/8/2019	Kill-Switch Proposal (last edited by Zilin Zhang April 8, 2019)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0176	META-FRASCO-0000006225 through META-FRASCO-0000006226	3/27/2019	Internal Meta Task by Zilin Zhang re "[Privacy Control]Kill Switch" created on March 27, 2019	Confidential	Anh Bui; Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0177	META-FRASCO-0000023471 through META-FRASCO-0000023546	3/12/2019	Advanced Matching for App (created on March 12, 2019)	HC-AEO	Anjali Dahiya; Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).

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0178	META-FRASCO-0000022596 through META-FRASCO-0000022616	12/19/2018 through 3/13/2019	Internal Meta messages (various) RE: Advance notice of publication -- How Facebook Tracks Users of Android Apps (to be published on December 29, 2018)	Confidential	Anjali Dahiya; Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0179	META-FRASCO-0000023547 through META-FRASCO-0000023604	6/24/2019	(IDFA Ranking Model Resilience 2019 H1 Retro) Part 1 - Overview, Impact, Challenges, Results, Limitations, and Future Directions (created on June 24, 2019)	HC-AEO	Anjali Dahiya; Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0180	META-FRASCO-0000026256 through META-FRASCO-0000026277	8/1/2019	S&I H2 2019 Roadmap for Post (created on August 1, 2019)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0181	META-FRASCO-0000025115 through META-FRASCO-0000025147	7/9/2019	(2019 H1) Christina Xu (Draft) re logging issue in Meta SDK that violates GDPR and user privacy (created on July 9, 2019)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0182	META-FRASCO-0000025572 through META-FRASCO-0000025582	6/27/2018	Wei H1 2018 Project: Ship Codeless App Event set up (created on June 27, 2018)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0183	META-FRASCO-0000025669 through META-FRASCO-0000025675	5/11/2019	(Draft) Vision for Private and Intelligent Facebook SDK (created on May 11, 2019)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0184	META-FRASCO-0000025649 through META-FRASCO-0000025664	8/31/2017	App Events Adoption and Quality - SE Pillar (created on August 31, 2017)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).

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0185	META-FRASCO-0000025703 through META-FRASCO-0000025705	7/24/2019	Handle Project Pause Properly (created on July 24, 2019)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay; Probative Value Outweighed  By Flo: Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0186		9/10/2024	Jennifer Golbeck PhD Appendix A, CV		Jennifer Goldbeck	Proof of expert's qualifications; part of expert's report and thus proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.	J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo & Meta: Hearsay; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0187	n/a	6/28/2024	Rebuttal Expert Report of Jennifer Golbeck, dated Ph.D., June 28, 2024		Jennifer Goldbeck	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.					Hearsay; Inadmissible Expert Opinion  By Flo: Personal Knowledge; MIL	Proper expert opinion/report. <i>See</i> ECF No. 597  MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0188	n/a	2/28/2019	Internal Google emails (Satvik Chauhan, David Schachter, Ben Solis-Cohen) re "SDK + UAC Commercialization: App Sensitive Categories (February 28, 2019 to March 7, 2019)		Ben Ewing	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0189	META-FRASCO-0000003276 through META-FRASCO-0000003278	2/22/2019	Wall Street Journal Article titled "Cuomo Calls for Probe Into Facebook's Collection of Sensitive Data from Apps"	n/a	Meta Custodian for Authentication	Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed; MIL  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0190	META-FRASCO-0000023433 through META-FRASCO-0000023444	4/4/2019	Quip referencing Bates -438	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay; Probative Value Outweighed  By Flo: MIL; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0191	META-FRASCO-0000022627 through META-FRASCO-0000022628	3/5/2019	Internal Meta message (Steve Satterfield, Anjali Dahiya, Andrew Howard) Re: Proposed Data Definitions	Confidential	Anjali Dahiya; Steve Satterfield; Andrew Howard	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: MIL; Relevance; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0192	META-FRASCO-0000008287 through META-FRASCO-0000008294	11/6/2020	Letter dated November 6, 2020 and titled "The Department of Financial Services' October 22, 2020 Telephone Conference with Facebook, Inc. re: Business Tools Investigation"	Confidential	Meta Custodian for Authentication; NYSDFS Representative; Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed; MIL  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0193	META-FRASCO-0000023605 through META-FRASCO-0000023614	3/29/2019	Quip showing Bates - 610	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay; Probative Value Outweighed  By Flo: MIL; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0194	META-FRASCO-0000022554 through META-FRASCO-0000022556	2/26/2019	E-mails dated February 26, 2019 re "PSI Briefing Request"	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Probative Value Outweighed; Hearsay  By Flo: MIL; Relevance; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0195	META-FRASCO-0000030001		E-mails re: "WSJ reporting on app sharing"	Confidential	Steve Satterfield; Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Probative Value Outweighed; Hearsay; MIL  By Flo: Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0196	META-FRASCO-0000023131	2/1/2019	Chat from Dahiya to Ron Sherman, Steve Satterfield, and Brad Weltman	Confidential	Anjali Dahiya; Steve Satterfield; Brad Weltman	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: MIL; Relevance; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0197	META-FRASCO-0000006336 through META-FRASCO-0000006337	2/27/2019	Internal Facebook chat	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: MIL; Relevance; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0198	META-FRASCO-0000006284 through META-FRASCO-0000006286	3/5/2019	Internal emails re: "FPF's take on WSJ article on health data/SDKs"	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defense					Relevance; Hearsay  By Flo: MIL; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0199	META-FRASCO-0000022647	3/5/2019	E-mail from Dahiya to Steve Satterfield about a question I received from the Messenger -- the Facebook Messenger team.	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defense					Relevance; Probative Value Outweighed; Hearsay  By Flo: MIL; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0200	META-FRASCO-0000022694 through META-FRASCO-0000022702	2/12/2019	Email from Shirine Sajjadi to Anjali Dahiya re: "ACTION REQUIRED: TEST APPROVAL"	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defense					Relevance; Probative Value Outweighed; Hearsay  By Flo: Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0201	META-FRASCO-0000006238	4/10/2019	Chat between Anjali Dahiya, Abbas Ravjani, et. al. re: WSJ article.	n/a	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Probative Value Outweighed; Hearsay  By Flo: Personal Knowledge; Authenticity; MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0202	META-FRASCO-0000006354	4/15/2019	Chat between Yura Kostiukech, Anjali Dahiya, et. al. re: data handling	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Probative Value Outweighed; Hearsay  By Flo: Personal Knowledge; Authenticity; MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0203	META-FRASCO-0000020787 through META-FRASCO-0000020862	3/12/2019	MDP Advanced Matching for App conversation history (Bates number ended in -826)	HC AEO	Nissa Anklesaria; Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0204	META-FRASCO-0000022617 through META-FRASCO-0000022619	2/20/2019	Internal messages between Anjali Dahiya and Steve Satterfield re: WSJ article and "hashed PII"	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Probative Value Outweighed; Hearsay  By Flo: MIL; Relevance; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0205	META-FRASCO-0000022963 through META-FRASCO-0000022966	2/26/2019	Emails re "PSI Briefing Request" (Myriah Jordan, Steve Satterfield, Erin Egan, Brian Rice, Kevin Martin, Grer Maurer)	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Probative Value Outweighed; Hearsay  By Flo: MIL; Relevance; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0206	META-FRASCO-0000023049	3/1/2019	Internal messages re PSI's hearing re WSJ's article	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay  By Flo: MIL; Relevance; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0207	META-FRASCO-0000023214 through META-FRASCO-0000023217	4/19/2019	E-mail from Toby Roessingh to Alexander Brasil, et. al. re: "Order ID for FS"	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Probative Value Outweighed; Hearsay  By Flo: Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0208	META-FRASCO-0000023392 through META-FRASCO-0000023432	9/5/2018	Internal document titled [MDP] Conversion Health	HC-AEO	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Relevance; Probative Value Outweighed; Hearsay  By Flo: Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0209	META-FRASCO-0000028491 through META-FRASCO-0000028492	5/1/2019	Meta Signals FYI Chat	HC AEO	Meta Custodian for Authenticity	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses	A. Dahiya; G. Nebol-Perlman; V. Sergiienko	Relevant to Absence of Eavesdropping	-		Relevance; Probative Value Outweighed; Hearsay  By Flo: Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0210	GOOG-FLO-00081653-656	5/28/2019	Email chain dated 5/28/19 re: [5-310000026659] Ads are Disproved / Approved (Limited) / Eligible (Case 5-3100000026659)	HC-AEO	Evgenia Olerinskaya; Maria Volchenok	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); balance favors admissibility (see Rules 401, 403); exhibit will be properly authenticated (see Rule 901)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0211	GOOG-FLO-00082935-937	9/27/2019	Email chain dated 9/27/19 re: [3-6269000028073] Ad Review  8072325127	Confidential	Evgenia Olerinskaya; Maria Volchenok	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); balance favors admissibility ( <i>see</i> Rules 401, 403); exhibit will be properly authenticated ( <i>see</i> Rule 901)
0212	GOOG-FLO-00082943	9/30/2019	Email dated 9/30/19 re: [3-6269000028073] Ad Review  8072325127	HC-AEO	Evgenia Olerinskaya; Maria Volchenok	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); balance favors admissibility ( <i>see</i> Rules 401, 403); exhibit will be properly authenticated ( <i>see</i> Rule 901)
0213	GOOG-FLO-00082931-932	9/27/2019	Email dated 9/27/19 Re: [3-6269000028073] Ad Review  8072325127	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); balance favors admissibility ( <i>see</i> Rules 401, 403); exhibit will be properly authenticated ( <i>see</i> Rule 901)
0214	GOOG-FLO-00081701-703	5/30/2019	Email chain dated 5/30/19 Re: [5-3100000026659] Ads are Disapproved / Approved (Limited) / Eligible (Case 5-3100000026659)	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); not hearsay ( <i>see</i> Rule 801) and/or hearsay exception applies ( <i>see</i> Rules 803, 804, 807); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); balance favors admissibility ( <i>see</i> Rules 401, 403); exhibit will be properly authenticated ( <i>see</i> Rule 901)
0215	n/a	2/27/2019	Memorandum of Decision & Order, Paul Jensen v. Cablevision Systems Corporation	n/a			J. Golbeck	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	-		By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	
0216	n/a	12/3/2013	Court Order, <i>Rembrandt Social Media v. Facebook</i>	n/a			J. Golbeck	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	-		By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	
0217	Flohealth_Golbeck_00000010-015	8/4/2022	Engagement Agreement between United Expert Holdings, LLC; J. Golbeck, and Labaton Sucharow	HC-AEO			J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Bias	-		By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	
0218		9/11/2019	Flo website post "Flo Is the #1 Health and Fitness App by Downloads Worldwide in the App Store" <a href="https://flo.health/newsroom/most-installed-app">https://flo.health/newsroom/most-installed-app</a>		Flo Custodian for Authentication	Proof of Flo's liability for violation of CMIA.					Relevance; Hearsay; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0219		n/a	"Medical accuracy and expertise: Why you can trust Flo" <a href="https://flo.health/medical-expertise">https://flo.health/medical-expertise</a>		Flo Custodian for Authentication	Proof of Flo's liability for violation of CMIA.					Relevance; Hearsay; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0220		n/a	About Us, FLO HEALTH, INC., <a href="https://flo.health/our-mission">https://flo.health/our-mission</a> (last visited Sept. 1, 2021)		Flo Custodian for Authentication	<a href="https://flo.health/our-mission">https://flo.health/our-mission</a>					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0221	n/a	2/24/2019	Sam Schechner, Popular Apps Cease Sharing Data With Facebook, Wall Street Journal, available at <a href="https://www.wsj.com/articles/popular-apps-cease-sharing-data-with-facebook-11551044791">https://www.wsj.com/articles/popular-apps-cease-sharing-data-with-facebook-11551044791</a>	n/a	Susan Schumacher Roman Bugaev Flo Custodian for Authentication	Rebut affirmative defenses; background/context; effect on Defendants.	S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	-		Personal Knowledge; Probative Value Outweighed; Hearsay; Authenticity; Relevance  By Flo: MIL	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0222		1/13/2021	Developer of Popular Women's Fertility-Tracking App Settles FTC Allegations that It Mislead Consumers About the Disclosure of their Health Data, FTC (Jan. 13, 2021) <a href="https://www.ftc.gov/news-events/press-releases/2021/01/developer-popular-womens-fertility-tracking-app-settles-ftc">https://www.ftc.gov/news-events/press-releases/2021/01/developer-popular-womens-fertility-tracking-app-settles-ftc</a>		FTC Representative	Rebut affirmative defenses.					Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay; MIL  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).
0223	PL001007	2/5/2020	Terms of Use, FLO HEALTH, INC. (effective Feb. 5, 2020) <a href="https://flo.health/terms-of-service">https://flo.health/terms-of-service</a>		Flo Custodian for Authentication		J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages	By Google & Meta: Relevance	
0224			Google Analytics Terms of Service		Google Custodian for Authentication						By Flo: Hearsay; Authenticity; Relevance; Probative Value Outweighed; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807). Exhibit will be properly authenticated (see Rule 901).The exhibit is relevant (see Rules 401, 402).Balance favors admissibility (see Rules 401, 403).Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0225		9/1/2021	This is AppsFlyer, APPSFlyer, INC. <a href="https://www.appsflyer.com/we-are-appsflyer/">https://www.appsflyer.com/we-are-appsflyer/</a> (last visited Sept. 1, 2021)		AppsFlyer Custodian for Authentication	Proof of Flo's liability for breach of contract, violation of the CMIA, and invasion of privacy.					Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay; Authenticity	The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).
0226	n/a	1/28/2020	Donna Rosato, What Your Period Tracker App Knows About You, Consumer Reports, available at <a href="https://www.yahoo.com/news/period-tracker-app-knows-110002532.html">https://www.yahoo.com/news/period-tracker-app-knows-110002532.html</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	-		Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay; Authenticity	
0227		1/13/2021	FTC Settlement		FTC Representative; Flo Custodian for Authentication	Rebutting Defendants' affirmative defenses; proof of damages, including punitive					Relevance; Probative Value Outweighed; Hearsay; Personal Knowledge; Authenticity; MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0228			FTC Decision & Order		FTC Representative; Flo Custodian for Authentication	Rebutting Defendants' affirmative defenses; proof of damages, including punitive					MIL; Relevance; Probative Value Outweighed; Hearsay; Personal Knowledge; Authenticity	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0229		7/5/2021-7/6/2021	Notice to Flo App users		Flo Custodian for Authentication	Proof of Flo's liability for violation of the CMIA, breach of contract, and invasion of privacy; Proof of Meta and Google's liability for violation of CIPA; rebut affirmative defenses.					Probative Value Outweighed; Hearsay; MIL; Relevance; Personal Knowledge; Authenticity	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0230		9/27/2019	Flo Health, Inc. Statement of Information, SEC'Y OF STATE OF THE STATE OF CAL. (Sept. 27, 2019), <a href="https://businesssearch.sos.ca.gov/Document/RetrievePDF?Id=04312974-26956704">https://businesssearch.sos.ca.gov/Document/RetrievePDF?Id=04312974-26956704</a>		Flo Custodian for Authentication	Rebutting affirmative defenses.					Relevance; Personal Knowledge; Hearsay; Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0231	n/a	3/2/2021	Class Action Complaint, <i>Chen v. Flo Health</i>	n/a	Jennifer Chen	Rebutting affirmative defenses.	J. Chen	Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility, Cross-Examination of the Named Plaintiffs	-		MIL  By Flo & Meta: Hearsay; Personal Knowledge; Relevance; Probative Value Outweighed	MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0232		3/1/2017	Google Privacy Policy (3/1/2017)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim,	-		By Flo: Hearsay; Authenticity; Relevance; Probative Value Outweighed; personal knowledge / Personal Knowledge	
0233		1/9/2023	Plaintiff Jennifer Chen's Responses and Objections to Defendant Google LLC's Interrogatories		Jennifer Chen	Proof of Flo's liability for violation of the CMIA, breach of contract, and invasion of privacy; Proof of Meta and Google's liability for violation of CIPA; rebut affirmative defenses.	J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay; Personal Knowledge; Relevance  By Flo: Authenticity; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0234		1/20/2023	Verification of Interogatory Responses dated 1/9/2023		Jennifer Chen	Proof of Flo's liability for violation of the CMIA, breach of contract, and invasion of privacy; Proof of Meta and Google's liability for violation of CIPA; rebut affirmative defenses.	J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay; Personal Knowledge; Relevance  By Flo: Authenticity; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0235	FLO-00000001	7/17/2019	Flo Privacy Policy, effective as of July 17, 2019	Confidential	Flo Custodian for Authentication	Proof of damages claims; Proof rebutting affirmative defenses	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Relevance; Personal Knowledge; Subsequent Remedial Measures  By Flo: Probative Value Outweighed	Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0236	FLO-00000289	8/19/2019	Flo Statement on Data Privacy (February 23, 2019)		Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages claims; proof rebutting affirmative defenses					Personal Knowledge; Relevance; Probative Value Outweighed; Subsequent Remedial Measures	Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0237	FLO-00000361	9/18/2019	List of user complaints Flo received		Flo Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof of damages					Probative Value Outweighed; Personal Knowledge; Hearsay  By Flo: Relevance	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0238	FLO-00001882	9/18/2019	September 9, 2019 email chain re: "Facebook Business Partner Data Requests #79414567607924"		Flo Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy					Personal Knowledge  By Flo & Meta: Hearsay; Relevance; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0239	FLO-00001907	3/15/2019	Letter to NYSDFS re " February 27, 2019 Letter to Flo Health, Inc."		Flo Custodian for Authentication; NYSDFS Representative	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof rebutting affirmative defenses					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; MIL  By Flo: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is oppsed.
0240	FLO-00001911	7/18/2019	2019.07.18 FTC CID Responses Letter		Flo Custodian for Authentication; FTC Representative	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof rebutting affirmative defenses					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; MIL  By Flo: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is oppsed.
0241	FLO-00003099	1/1/2000	3-15-19 - Flo Submission - CONFIDENTIAL.PDF		Flo Custodian for Authentication; NYSDFS Representative	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof rebutting affirmative defenses					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay  By Flo: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0242	FLO-00003368	8/9/2022	Flo's Response to the FTC Settlement.mht		Flo Custodian for Authentication; NYSDFS Representative	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof rebutting affirmative defenses					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; MIL  By Flo: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is opposed.

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0243	META-FRASCO-0000023832		Governor Guomo of New York announces end to investigat_1c_u1erRdMPFwz99t3hyEJP35hXsvx_GtrdBPP8CECiE.docx	Confidential	Anjali Dahiya	Rebutting affirmative defenses.					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; MIL  By Flo; Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is opposed.
0244	FLO-00000359		Organizational chart		Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims.					Hearsay; Relevance; Probative Value Outweighed; Authenticity; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0245	GOOG-FLO-00056047	9/13/2018	-ACM Graveyard- 1P SDK strategy for Apps_1ZzocAfzzEpFgt2JDD653PabZ_vVgVdUajCQvQJd2X4jA.pptx	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of contract, and invasion of privacy.					Relevance; Personal Knowledge; Hearsay; Authenticity; Probative Value Outweighed	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0246	GOOG-FLO-00057249	8/16/2018	"Baseview Data analysis" – excel spreadsheet of events		Kevin Lam Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of contract, and invasion of privacy.					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0247	GOOG-FLO-00057699	6/26/2018	Document titled "Realigning our Measurement Strategy: 2018-2019"	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of contract, and invasion of privacy.					Relevance; Personal Knowledge; Hearsay  By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0248	GOOG-FLO-00057733		Email from Steve Ganem to Google Analytics Leads titled "Fwd: [Please Read] Fabric Deprecation MSA set for Wed 10/2 10am est"	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of contract, and invasion of privacy.					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0249	GOOG-FLO-00058814	8/3/2019	Document titled "Data for ML and the future of Measurement for Apps"	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of contract, and invasion of privacy.					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0250	FLO-00004555 through FLO-00004575	6/21/2019	FTC Civil Investigative Demand on June 18, 2019 to Flo Health, Inc.		Flo Custodian for Authentication; FTC Representative	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof rebutting affirmative defenses					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; MIL  By Flo: Subsequent Remedial Measures  By Google: Authenticity	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Not subsequent remedial measures and/or exception applies (see Rule 407).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0251	FLO-00066602	6/29/2020	Email Subject: A data deletion request was submitted for flo.health (161488023)		Alexei Azarov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof of damages					Hearsay  By Flo & Meta: Subsequent Remedial Measures; Relevance; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0252	FLO-00066963	7/16/2019	Email Subject: Request to update and confirm your app's use of the Facebook SDK		Roman Bugaev; Eugene Tiunovich	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; proof of damages					Hearsay  By Flo & Meta: Subsequent Remedial Measures; Relevance; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0253	FLO-00066982	9/26/2019	Email Subject: Re: Data Request		Eugene Tiunovich	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					No Certified Translation  By Flo: Hearsay; Subsequent Remedial Measures; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0254	FLO-00066994	9/13/2019	Email Subject: Data Request		Eugene Tiunovich	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					No Certified Translation  By Flo: Hearsay; Subsequent Remedial Measures; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0255	FLO-00068389	2/3/2021	Email Subject: [JIRA] Denae Thibault mentioned you on TS-243		Valeriya Silenkova	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages claims					MIL  By Flo: Hearsay; Subsequent Remedial Measures; Relevance; Probative Value Outweighed; No Certified Translation	No translation needed because document is in English.  The MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0256	FLO-00068489	9/17/2019	Email Subject: Facebook sharing		Valeriya Silenkova	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Probative Value Outweighed; MIL; No Certified Translation  By Flo: Hearsay; Relevance; Authenticity; Subsequent Remedial Measures	Will present certified translation and/or translator as a witness.  The MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0257	FLO-00070873	3/27/2020	Email Subject: Appsflyer Communication		Roman Bugaev	Proof of damages.					No Certified Translation  By Flo: Hearsay; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
0258	FLO-00072302	8/6/2019	Email Subject: Re: Обвинение в сливе данных		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages claims					No Certified Translation; Hearsay; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0259	FLO-00072306	8/5/2019	Email Subject: Обвинение в сливе данных		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages claims					No Certified Translation; Hearsay; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
0260	FLO-00072363	6/27/2019	Email Subject: Re: Очередное обвинение в сливе данных		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages claims					No Certified Translation; Hearsay; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
0261	FLO-00072371	6/24/2019	Email Subject: Re: Очередное обвинение в сливе данных		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims.					No Certified Translation; Hearsay; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
0262	FLO-00072409	4/29/2019	Email Subject: Invitation: Apple Discussion @ Tue Apr 30, 2019 12pm-2pm (MSK) (r_bugaev@flo.health)		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims.					No Certified Translation  By Flo: Hearsay; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
0263	FLO-00072590	2/26/2019	Email Subject : Re: Заявление Flo и предыстория вопроса		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims.					No Certified Translation; Hearsay; Relevance; Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0264	FLO-00072636	2/27/2019	Email Subject: Re: Bayer/Flo: PR strategy + analytical tools usage		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; MIL; Hearsay; Probative Value Outweighed  By Google & Meta: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0265	FLO-00072650	2/27/2019	Email Subject: Fwd: Bayer/Flo: PR strategy + analytical tools usage		Roman Bugaev	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Hearsay; MIL  By Flo: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0266	FLO-00072767	9/17/2018	Email Subject: Re: Events for Google Analytics		Roman Bugaev	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					No Certified Translation; Hearsay; Relevance  By Flo: Probative Value Outweighed; Authenticity  By Google & Meta: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0267	FLO-00072812	4/3/2019	Email Subject: Post mortem for WSJ - здесь еще начали работать юристы, над...		Roman Bugaev	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					No Certified Translation; Hearsay; Relevance  By Flo: Probative Value Outweighed; Authenticity; MIL  By Google & Meta: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The MIL is opposed.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0268	FLO-00072814	Mar-21	Flo Investor deck March 2021		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0269	FLO-00074877	1/14/2021	Email Subject: Re: Flo – December monthly reporting pack		Tamara Orlova; Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay; MIL  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).
0270	FLO-00075317	7/16/2020	Revenue 2018-2019 actuals – accrual basis		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed  By Flo: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0271	FLO-00075585		Presentation titled: Latest trends with Flo 5.0 on board		Tamara Orlova	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0272	FLO-00075960	7/16/2020	Revenue 2018-2019-2020 actuals – accrual basis		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0273	FLO-00076771	1/10/2020	Email Subject: Re: Flo Health <> WTI		Tamara Orlova	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims; Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay  By Flo: MIL: Probative Value Outweighed; Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0274	FLO-00092941	3/25/2019	Email Subject: Re: Questions to Flo		Timofei Savitski	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Hearsay; MIL  By Flo: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0275	FLO-00094528		Flo__Apple_ Detailed Meeting Follow-up (1)		Max Scrobov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					No Certified Translation; Hearsay  By Flo: Authenticity; Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0276	FLO-00094607		Flo Deck for Samsung		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims					Probative Value Outweighed; Hearsay  By Flo: Authenticity; Relevance; MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The MIL is opposed.
0277	FLO-00094734		Post mortem for WSJ		Max Scrobov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Probative Value Outweighed; Hearsay  By Flo: Authenticity; Relevance; MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The MIL is opposed.
0278	FLO-00094904	2/21/2018	Email Subject: Re: Bi-weekly business and project review		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					No Certified Translation  By Flo: Hearsay; Authenticity; Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  Will present certified translation and/or translator as a witness.
0279	FLO-00094932	1/9/2018	Email Subject : Ивентты фло		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					No Certified Translation; Relevance; Hearsay  By Flo: Authenticity; Probative Value Outweighed  By Google & Meta: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  Will present certified translation and/or translator as a witness.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0280	FLO-00094933	10/23/2017	Events	Confidential	Max Scrobov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					No Certified Translation; Relevance; Hearsay  By Flo: Authenticity; Probative Value Outweighed  By Google: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  Will present certified translation and/or translator as a witness.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0281	FLO-00095076	11/25/2017	Email Subject: Re: Amplitude Commercials Follow Up		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0282	FLO-00095085	11/24/2017	Amplitude <-> Flo by OWHealth POC		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0283	FLO-00095089	11/24/2017	Email Subject: Re: Amplitude Commercials Follow Up		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0284	FLO-00095098	11/24/2017	Email Subject: Re: Amplitude Commercials Follow Up		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0285	FLO-00095194	10/14/2022	Additional Questions		Roman Bugaev	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).
0286	FLO-00095201	11/7/2019	Aggregated Performance Report		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed  By Flo: Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403)
0287	FLO-00095218	7/6/2020	Roman Bugaev_Engineering		Roman Bugaev	Provides relevant background information for witness Roman Bugaev					Relevance; Hearsay  By Flo: Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0288	FLO-00096195	6/21/2019	FTC Civil Investigative Demand to Flo Health, Inc.		Timofei Savitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Probative Value Outweighed; Hearsay; MIL  By Flo: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Not subsequent remedial measures and/or exception applies (see Rule 407).
0289	FLO-00097215	10/14/2022	Excel Spreadsheet of App Events Statistics		Timofei Savitski	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Probative Value Outweighed  By Flo: Hearsay; Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0290	FLO-00101205	2/15/2019	Slack messages between Roman Oreshko and Roman Bugaev		Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof rebutting Defendants' defenses					No Certified Translation  By Flo: Hearsay; Authenticity; Relevance; Probative Value Outweighed	Will present certified translation and/or translator as a witness  The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0291	FLO-00101346	3/15/2017	Flo Product Strategy		Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof rebutting Defendants' defenses					No Certified Translation; Hearsay; Authenticity; Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  Will present certified translation and/or translator as a witness
0292	FLO-00101510	6/29/2021	Flo's email notice to users re FTC settlement		Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims.					Hearsay; Relevance; Probative Value Outweighed; MIL  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.  Exhibit will be properly authenticated (see Rule 901).
0293	GOOG-FLO-00091762	9/4/2015	Of Audiences and IDs	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of contract, and invasion of privacy.					Relevance; Personal Knowledge; Hearsay  By Flo: Probative Value Outweighed; Authenticity;	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0294	FLO-00104753	5/24/2019	Data Retention and Disposal Policy		Timofei Savitski	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims.					Hearsay; Relevance: Probative Value Outweighed  By Flo: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0295	FLO-00105087	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0296	FLO-00105092	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0297	FLO-00105173	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0298	FLO-00105180	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0299	FLO-00105185	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0300	FLO-00105481	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0301	FLO-00105626	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0302	FLO-00106155	4/15/2023	Flo App Change Log (Android)		Flo Custodian for Authenticity	Proof of Flo's liability for breach of contract, CMIA, CIPA, invasion of privacy; proof of Meta and Google's liability for violation of CIPA.					Hearsay; Relevance; Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0303	FLO-00095115	11/23/2017	User data that Flo exported from Flurry and sent to AppsFlyer	Confidential	Max Serobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages, including punitive.					Relevance; Probative Value Outweighed; Hearsay; Authenticity  By Google: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0304	Frasco-AF-000078	2/19/2019	Flo's Order Form for AppsFlyer's services		AppsFlyer Custodian for Authentication  Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages, including punitive.					Hearsay; Relevance; Probative Value Outweighed; Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0305	BAY0000008_0001	1/31/2019	FemTech Update — Digital Channel Experiments		Flo Custodian for Authentication; Bayer Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of damages, including punitive.					MIL; Relevance; Probative Value Outweighs; Personal Knowledge; Hearsay; Authenticity	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0306	n/a	4/17/2023	Google's 2nd and 3rd Supplemental Interrogatory Responses, Set 1		Oscar Takabvirwa Kevin Lam	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Personal Knowledge  By Flo: Hearsay; Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).
0307	GOOG-FLO-00092178-00092258	Unknown	Firebase Analytics - Backend Processing Pipeline	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0308	GOOG-FLO-00056960-00057193	5/31/2018	Apps XFN OffSite	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0309	GOOG-FLO-00058113-00058149	Unknown	Firebase Leadership Review Notes	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0310	GOOG-FLO-00059849-00060017	8/29/2019	Analytics and Attribution 2020 Strategy OffSite	HC-AEO	Kevin Lam Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0311	GOOG-FLO-00020088-00020089	Unknown	Analytics Help webpage, "GA4 Reporting identity"		Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0312	GOOG-FLO-00091573-00091575	6/17/2019	Email to Steve Ganem re "GA (App + web) Ads Linking in GAFE - GA Leads Review"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0313	GOOG-FLO-00088930-00088936	Unknown	Gold for Apps	HC-AEO	Kevin Lam Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0314	GOOG-FLO-00062377-00062507	7/1/2020	Google Analytics for Firebase - Accelerate Wells Fargo's app business with the GA for Firebase SDK	HC-AEO	Kevin Lam	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0315	GOOG-FLO-00091793-00091797	12/17/2019	Email from David Schachter to multiple recipients re "GA4F and CCPA"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0316	GOOG-FLO-00091831-00091835	Unknown	Suggested App-specific FAQs to be added to go/ccpa-comms	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0317	GOOG-FLO-00090798-00090816	6/20/2018	Gold-Based Targeting in Firebase	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0318	GOOG-FLO-00055992-00056040	4/1/2018	App Ads SDK Strategy	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0319	GOOG-FLO-00056678-00056679	Undated	Employee evaluation of Steve Ganem Q4'18-Q1'19	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0320	GOOG-FLO-00062120-00062376	Undated	Partnership App Immersion	HC-AEO	Kevin Lam	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0321	GOOG-FLO-00058263-00058393	5/30/2019	Apps Leadership Onsite Meeting deck	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0322	GOOG-FLO-00082346-00082354	6/24/2019	Email from Arsen Israpilov (Google) to Evgenia Olerinskaya (Google) re "DC Weekly Q2, 2019"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0323	GOOG-FLO-00081510-00081511	4/18/2019	Certified translation - Email from Maria Volchenok (Google) to Anna Kitaevskaya (Flo) re "Flo <> Google // questions"	HC-AEO	Evgenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0324	GOOG-FLO-00082477	7/24/2019	Certified translation - Email from Maria Volchenok (Google) to Anna Kitaevskaya (Flo) re "android video only campaigns request"	HC-AEO	Evgenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0325	GOOG-FLO-00083127-00083142	12/6/2019	Email from Maria Volchenok (Google) To Kseniya Kurchych (Flo) re "AppsFlyer support Update: Google Adwords Discrepancy"	HC-AEO	Evgenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0326	GOOG-FLO-00073910-00073921	1/22/2021	Google Analytics webpage, "What's new"	HC-AEO	Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0327	GOOG-FLO-00067973-00067974		Google Analytics webpage, "Advanced settings to allow for ads personalization"		Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.	S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo & Meta: Relevance; Hearsay; Probative Value Outweighed; Authenticity; Personal Knowledge	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0328	GOOG-FLO-00088952-00088958	2/28/2018	Uno Sensitive Data PRD	HC-AEO	Kevin Lam Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0329	GOOG-FLO-00093185-00093191	9/23/2020	Email from Yusuke Fujita (Google) to Denise Seligsohn (Google) re "GA4F - Data sharing: not to export gAds from Firebase"	HC-AEO	Kevin Lam	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0330	GOOG-FLO-00091653-00091654	8/30/2019	Email from James Cote (Google) to Steve Ganem re "CCPA impact to GA and GA for Firebase"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0331	GOOG-FLO-00090247-00090262	3/17/2020	Email from Anh Tran (Google) re "fork: Implementation of sensitive iba in UAM"	HC-AEO	Ben Ewing	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0332	GOOG-FLO-00090059-00090063	3/7/2019	Email from Satvik Chauhan (Google) to multiple recipients re "SDK + UAC Commercialization Followup: App Sensitive Categories"	HC-AEO	Ben Ewing	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0333	GOOG-FLO-00091970-00091972	8/25/2020	Email from Thejas Durgam (Google) to multiple recipients re "Audience metadata"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0334	GOOG-FLO-00082913-00082915	9/25/2019	Email from Maria Volchenok (Google) to AdWords Support, cc Flo Health, re "Ad Review"	HC-AEO	Evgenia Olerinskaya Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0335	GOOG-FLO-00078294-00078296	10/20/2020	Email from Ads Support to Maria Volchenok re "Campaign is only servicing text assets"	HC-AEO	Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0336	GOOG-FLO-00085461-00085487	11/27/2020	Email from Nikita Strelnikov (Google) to Igor Krupski (Flo) re "Delivery Status Notification (Failure)"	HC-AEO	Eugene Tiunovich Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Personal Knowledge  By Flo & Meta: Probative Value Outweighed; Authenticity  By Google & Meta: Relevance; No Certified Translation; Hearsay	The exhibit is relevant (see Rules 401, 402); balance favors admissibility (Rule 403); not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be properly authenticated (see Rule 901); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902)  Will present certified translation and/or translator as a witness.
0337	GOOG-FLO-00078784-00078791	10/16/2020	User Data Retention and Deletion Guidelines	HC-AEO	Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0338	GOOG-FLO-00081749	6/14/2019	Email from Maria Volchenok (Google) to Vlad Popa-Florea and Tanja Braendle re "FLO: Sensitive Firebase SDK case"	HC-AEO	Evgenia Olerinskaya Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0339	GOOG-FLO-00081853-00081858	6/13/2019	Certified translation - Email from Evgenia Olerinskaya to Maria Volchenok re "Flo Planning"	HC-AEO	Evegenia Olerinskaya Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0340	GOOG-FLO-00084753-00084754	9/29/2020	Email from Google Ads Support to Nikita Strelnikov (Google), cc Flo Health and Maria Volchenok, re "Personalized Ads policy 807-232-5127"	HC-AEO	Evegenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0341	GOOG-FLO-00084859	10/14/2020	Email from Google Ads Support to Maria Volchenok, re "Personalized Ads policy 807-232-5127"	HC-AEO	Evegenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0342	GOOG-FLO-00061865-00061872	12/15/2020	Email from Maria Volchenok, cc Kevin Lam and Flo, re "Firebase + GDPR / CCPA"	HC-AEO	Kevin Lam Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0343	GOOG-FLO-00057427-00057429	6/25/2019	Email from Nikita Strelnikof to Steve Ganem re "Firebase/ S2S instead of SDK / FLO"	HC-AEO	Steve Ganem Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0344	GOOG-FLO-00057375	6/5/2019	Email from Onil Gunawardana (Google) to Steve Ganem re "Sensitive Category Data"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0345	GOOG-FLO-00055332-00055423	6/1/2017	Slide deck, "Firebase + GA: Analytics Offsite"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge  By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0346	GOOG-FLO-00037401-00037402	1/30/2023	Google Analytics webpage, "Data sharing settings"	HC-AEO	Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.	Steve Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo & Meta: Hearsay; Relevance; Probative Value Outweighed; Authenticity; Personal Knowledge	The exhibit is relevant ( <i>see</i> Rules 401, 402); foundation/personal knowledge will be established ( <i>see</i> Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated ( <i>see</i> Rule 901); balance favors admissibility ( <i>see</i> Rules 401, 403)
0347		6/9/2025	Defendant Google's Fifth Supplemental Responses to Plaintiffs' Interrogatories, Set One		Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance, Hearsay, Personal Knowledge  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0348		7/1/2022	Defendant Meta's Responses and Objections to Plaintiffs' First Set of Interrogatories		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA.					Hearsay, Personal Knowledge  By Flo: Probative Value Outweighed  By Meta: Subsequent Remedial Measures  By Google: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0349		10/31/2022	Defendant Meta's Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories		Anjali Dahiya, Wei Liu, Karan Shah	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA.					Hearsay, Personal Knowledge  By Flo: Probative Value Outweighed  By Meta: Subsequent Remedial Measures  By Google: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0350		9/6/2022	Defendant Meta's Responses and Objections to Plaintiffs' Second Set of Interrogatories		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA.					Hearsay, Personal Knowledge, Probative Value Outweighed  By Meta: MIL; Subsequent Remedial Measures  By Google: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).  MIL is opposed.
0351		12/7/2022	Defendant Meta's Responses and Objections to Plaintiffs' Fourth Set of Interrogatories		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA.					Hearsay, Personal Knowledge  By Flo: Authenticity; Probative Value Outweighed  By Google: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).
0352	META-FRASCO-0000369433	11/30/2022	Flo Health - Campaign Dates		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA					Hearsay, Personal Knowledge, Probative Value Outweighed; MIL  By Flo: Authenticity  By Meta: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.
0353	META-FRASCO-0000001217	6/1/2021	Mobile App Custom Audiences Created by Flo Health from June 2016 to June 2021		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA					Hearsay, Personal Knowledge, Probative Value Outweighed; MIL  By Flo: Authenticity  By Meta: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.
0354	META-FRASCO-0000002286	6/1/2021	Flo Health App Ad Optimization Objectives June 2016 to June 2021		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA					Hearsay, Personal Knowledge, Probative Value Outweighed; MIL  By Flo: Authenticity  By Meta: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0355	META-FRASCO-0000019631	6/1/2021	Meta Advertising Revenue Based on App Events Sent to Meta by the Flo App (June 1, 2016 to June 1, 2021)		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA; proof of damages, including punitive.					Hearsay, Personal Knowledge, Probative Value Outweighed; MIL  By Flo: Authenticity  By Meta: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.
0356	FLO-00095166	2/6/2019	Email Subject: Flo Review Status		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive. Rebutting affirmative defenses.					No Certified Translation, Hearsay  By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.
0357	FLO-00098063	5/29/2019	Flo Competitive Advantages: Executive Summary.		Max Scrobov	Proof of Flo's liability for CMIA; proof of damages, including punitive. Rebutting affirmative defenses.					Personal Knowledge, Hearsay; Relevance  By Meta: MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  MIL is opposed.
0358	FLO-00095107	11/23/2017	Email from Max Scrobov to Dave Sherry. Re: "Amplitude Commercials Follow Up."		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive. Rebutting affirmative defenses.					Hearsay, Relevance  By Flo: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0359	FLO-00094056	3/27/2020	Email from Max Scrobov to Timon Afinsky Re: WSJ Article. Chart listing quote mentioning Flo and Flo's comments.		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance; MIL  By Flo: Personal Knowledge  By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.
0360	FLO-00094061	3/25/2020	Email from Dmitry Gurski to Nadia Antsiferova. Cc Max Scrobov. Re: Flo: Time-sensitive support and feedback required		Dmitry Gurski Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).
0361	FLO-00101589	4/20/2021	Short message Report-Outline of conversations. Eugene Tiunovich. Sergey Kleymenov.		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge  By Meta: MIL	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).  MIL is opposed.
0362	FLO-00066841	6/13/2019	Email from Anna Kitaevskaya to Roman Bugaev. Re: Google Ads. (English & Russian version)		Roman Bugaev Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).
0363	FLO-00101444	10/2/2020	Short message-Outline of conversation. Ilya -Flo. Kiryl Prakopchyk, Lera Shchukina, Ilya Gnatuyuk.		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0364	FLO-00101620	5/24/2021	Short message Report-Outline of conversations. Eugene Tiunovich, Ivan Borodulin.		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).
0365	FLO-00101383	8/22/2019	Short message Report-Outline of Conversations. Dmitry Silchenko. Eugene Tiunovich		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).
0366	META-FRASCO-0000006170	11/12/2019	Email from Eugene Tiunovich to Oleksii Bagdasarov. Re: Flo Health + Facebook/Intro Call.		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA.					Hearsay, Relevance, No Certified Translation  By Flo: Authenticity, Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0367	META-FRASCO-0000006393	1/28/2021	Email from Eugene Tiunovich to Edward Dendievel. Re: "Can't create a campaign targeted at teenagers."		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA.					Personal Knowledge, Hearsay, Relevance  By Flo: Authenticity  By Meta: Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).  Balance favors admissibility (see Rules 401, 403).
0368	META-FRASCO-0000021504	1/14/2020	Email from Eugene Tiunovich to Oleksii Bagdasarov. Re: Cpo4hble Bonpocbl no pabote facebook.		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Authenticity, Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0369	FLO-00067079	6/10/2021	Email from Eugene Tiunovich to Edward Dendievel & others. Re: FTC		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Hearsay, Relevance; MIL  By Flo: Personal Knowledge  By Meta: Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).  MIL is opposed.
0370	FLO-00067080	6/10/2021	Email from Eugene Tiunovich to FB employees Subject: FTC screen		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Hearsay, Relevance; MIL  By Flo: Personal Knowledge  By Meta: Subsequent Remedial Measures; Cumulative (of FLO-00067079)	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).  MIL is opposed.  Not cumulative or duplicative.
0371	FLO-00067081		Flo screenshot		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Relevance, Subsequent Remedial Measures  By Flo: Personal Knowledge, Hearsay  By Meta: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0372	FLO-00067083		Flo screenshot		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Relevance, Subsequent Remedial Measures  By Flo: Personal Knowledge, Hearsay  By Meta: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Exhibit will be properly authenticated (see Rule 901).
0373	FLO-00067082		Flo screenshot		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Relevance, Subsequent Remedial Measures  By Flo: Personal Knowledge, Hearsay  By Meta: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Exhibit will be properly authenticated (see Rule 901).
0374	FLO-00067084		Flo screenshot		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Relevance, Subsequent Remedial Measures  By Flo: Personal Knowledge, Hearsay  By Meta: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).  Exhibit will be properly authenticated (see Rule 901).
0375	FLO-00094867	8/6/2018	Email from OWHealth Support to Max Scrobov. Re: Fwd: Did you sell my info?		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Hearsay, Probative Value Outweighed, MIL  By Flo: Personal Knowledge  By Meta: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.
0376	FLO-00094080		Flo "Privacy & Security at Flo."		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Personal Knowledge, Hearsay, MIL  By Meta: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  MIL is opposed.  Not subsequent remedial measures and/or exception applies (see Rule 407).
0377	FLO-00072578	3/15/2019	Screenshot-image of consent screen: "Welcome-I agree to Privacy Policy and Terms of Use."		Flo representative for authentication Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					By Meta: Relevance; Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0378	FLO-00102817		Short Message Report- Outline of Conversations. Zendesk ticket 17903. Saina Shelton, Kate.		Flo representative for authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive; rebut affirmative defenses.					Personal Knowledge, Relevance, Hearsay, Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).
0379	FLO-00072505	3/19/2019	Email from Jonas Mitschele to Flo Health. Re: Bayer/Flo: analytical tools usage.		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Personal Knowledge, Relevance, Hearsay; MIL  By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  MIL is opposed.

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0380			Track app conversions with third-party app analytics		Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Authenticity, Personal Knowledge, Hearsay  By Meta: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0381	GOOG-FLO-00057393 to GOOG-FLO-00057394	6/19/2019	Email from Onil Gunawardana to Steve Ganem and Rahul Oak. "Fwd: Firebase/S2S instead of SDK/FLO."	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA; damages, including punitive.					Hearsay, Relevance  By Flo: Personal Knowledge, Authenticity  By Meta: MIL; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0382	GOOG-FLO-00089626 through 00089643		"Publisher Controls – App models"	HC-AEO	Google representative for authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Personal Knowledge, Hearsay, Relevance  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0383	GOOG-FLO-00000122 through 128		"Advertising Policies Help" webpage, section entitled "Personalized Advertising"		Google representative for authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					By Meta: Personal Knowledge, Hearsay, Relevance  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0384	GOOG-FLO-00081220	11/7/2017	Email re "Re: Dating Weekly Plan Q4 2017" dated	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Hearsay; Relevance  By Flo: Authenticity, Personal Knowledge  By Google: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0385	GOOG-FLO-00081371	3/5/2019	Email re "[1-2433000025864] Advertiser, Market, and Competitive Insights (Case 1-2433000025864)"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA; damages, including punitive.					Personal Knowledge, Hearsay; Relevance  By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0386	FLO-00104564	7/11/2017	Flo app Terms of Service, published July 11, 2017 and in effect through November 15				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims		-		
0387	FLO-00104524	11/27/2017	11/27/2017 Terms of Service				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims		-		
0388	FLO-00104551	5/23/2018	5/23/2018 Terms of Service				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims		-		
0389	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	5/24/2018	5/24/2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Inadmissible to the extent the exhibit is duplicative and therefore cumulative and waste of time	Not duplicative and is necessary to establishing Flo's affirmative defenses and rebutting all of Plaintiffs' claims	-	Not duplicative and is necessary to establishing Flo's affirmative defenses and rebutting all of Plaintiffs' claims
0390	FLO-00003107		Terms of Service [Undated]				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims		-		

EXHIBIT A  
Joint Preliminary Trial Exhibit List  
Frasco v. Flo Health, Inc., et al. (Case No. 3:21-cv-00757-JD)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0391	FLO-00104557	6/22/2018	Flo app Terms of Service, Effective June 22, 2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
0392	FLO-00104530	11/16/2018	Flo app Terms of Service, published November 16, 2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0393	FLO-00104537	11/19/2018	Flo App Terms of Service, published November 19, 2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0394	FLO-00104544	12/26/2018	Flo app Terms of Service, published December 26, 2018 and in effect through February 5, 2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plaintiffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0395	FLO-CHEN-0000086	2/2/2021	Email from J. Yardley to ConsumersAdvocates.com re Health App Privacy Class Action Investigation	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Lack of Harm, Relevant to Witness Credibility	-		-	
0396	n/a	n/a	Biography of P. Chen, Garner & Associates LLP	n/a			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	Not relevant to any claim or defense	Relevant to witness credibility and to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0397	n/a	n/a	Bankruptcy docket for T. and J. Alexander, Case No. 8:94-bk-17096-JW (C.D. Cal. Dec. 21, 1994)	n/a			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility	Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
0398	n/a	n/a	Bankruptcy docket for J. Chase, Case No. 09-43711 (E.D. Tex. Mar. 1, 2010)	n/a			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility	Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
0399		2007-12-26 (2023-01-20)	California Franchise Tax Board, Notice of State Tax Lien for J. Alexander				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0400		2008-08-29 (2023-01-20)	Income and Expense Declaration for J.Alexander, Case No. 98D010142, filed in Superior Court of California for the County of Orange				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to CIPA 632 claim even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
0401	FLO-CHEN-0000070	6/18/2019	Email from FollowMyHealth Patient Portal to J. Yardley re Health Record Update	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.	-	
0402	n/a	11/13/2019	Allscripts Healthcare, LLC Privacy Policy	n/a			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Consent, Relevant to License Defense	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-	
0403	FLO-CHEN-0000081	12/15/2020	Email from MyQuest to J. Yardley re Your Quest Diagnostics Lab Results are Now Available through MyQuest	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim even if outside class period.	-	
0404	n/a	12/30/2022	Quest Diagnostics Privacy Policy				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Consent, Relevant to License Defense	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim even if outside class period.	-	
0405	FLO-CHEN-0000079	5/17/2022	Email from MyUCDavisHealth to J. Yardley re New Message in Patient Portal	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim even if outside class period.	-	
0406	FLO-CHEN-0000084	4/11/2018	Email from Teladoc to J. Yardley re Creation of Account	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-	
0407		1/20/2023	J. Chen Google Review of Yardley Healing Arts				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-	



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0408	FLO-00000285	n/a	OwHealth, Inc. Terms of Service	Confidential			S. Schumacher; J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs;; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-		-	
0409	FLO-CHEN-0000003	2/1/2019	Email with subject line: Your personal Google+ account is going away on April 2, 2019	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
0410			Jennifer Chen 1/20/2023 Deposition Exhibit 136 - Email				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0411			Erica Frasco 1/23/2023 Deposition Exhibit 140 - Written retention agreement				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Privileged attorney-client communication	This is not privileged, and, even if it were, any privilege was waived by producing this document in the course of discovery.	-	
0412			Erica Frasco 1/23/2023 Deposition Exhibit 141 - Skills portion of LinkedIn profile of Erica Frasco				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.	-	
0413			Erica Frasco 1/23/2023 Deposition Exhibit 142 - Courses portion of LinkedIn profile of Erica Frasco				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.	-	
0414			Erica Frasco 1/23/2023 Deposition Exhibit 144 - Facebook birthday post, 11/29/2021				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.	-	
0415			Erica Frasco 1/23/2023 Deposition Exhibit 145 - Erica Frasco's Facebook profile				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.	-	
0416			Erica Frasco 1/23/2023 Deposition Exhibit 146 - Facebook post, 12/30/2019				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.	-	
0417			Erica Frasco 1/23/2023 Deposition Exhibit 149 - Google privacy policy				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0418			Erica Frasco 1/23/2023 Deposition Exhibit 150 - Plaintiff Erica Frasco's Responses and Objections to Defendant Google LLC's Interrogatories to Plaintiff Erica Frasco				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0419			Erica Frasco 1/23/2023 Deposition Exhibit 151 - Poosh information about the use of cookies				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0420			Erica Frasco 1/23/2023 Deposition Exhibit 152 - Instagram liked posts				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0421			Erica Frasco 1/23/2023 Deposition Exhibit 153 -March 9, 2009, Facebook post by Erica Frasco				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Probative value substantially outweighed by danger of confusing the issues	Probative value outweighs any potential confusion because it is relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0422			Erica Frasco 1/23/2023 Deposition Exhibit 154 - October 23, 2020 Facebook post by Erica Frasco in the group The Grande at Riverdale				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0423	FLO-GAMINO-0002342	8/17/2009	Email from Facebook Business to T. Gamino re Help your Page audience stay engaged with new content	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages. Relevant to witness credibility even if outside class period.	-	
0424	n/a	10/18/2020	T. Gamino Instagram Post	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Job-related post; not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period; "job-related post" is not a proper basis for objection.	-	
0425		12/8/2022	Tesha Gamino ProPublica Tracking PPP				T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	Not relevant to any claim or defense; outside class period ( <i>see</i> Rules 401, 402)	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period.	-	
0426		12/8/2022	Tesha Gamino ProPublica Tracking PPP (Second Round)				T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period.	-	
0427	FLO-GAMINO-0004274	7/19/2018	Email from FB Ads Team to T. Gamino re Your First Facebook Ads Receipt (Account ID: 189133535125494)	Confidential			T. Gamino	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense		-	
0428	FLO-GAMINO-0004173	7/27/2018	Email from FB Ads Team to T. Gamino re your first promotion just finished	Confidential			T. Gamino	Relevant to Lack of Harm, Relevant to Witness Credibility	-		-	
0429	FLO-GAMINO-0000530	3/15/2021	Email from FB Ads Team from T. Gamino re Join the Facebook Business Insights Panel	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages. Relevant to witness credibility even if outside class period.	-	
0430	FLO-GAMINO-0004261	7/3/2018	Email from Top Class Actions to T. Gamino re Top Class Actions & Lawsuits Newsletter	Confidential			T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Lack of Harm, Relevant to Witness Credibility	Not relevant to any claim or defense		-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0431	n/a	n/a	T. Gamino @3evergang Instagram Page	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-	
0432	n/a	n/a	T. Gamino @teshagamino Instagram Page	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-	
0433	n/a	6/20/2018	T. Gamino Facebook Posts	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Photos of children; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Photos of children" is not a proper basis for objection.	-	
0434	n/a	2/19/2021	T. Gamino 3evergang Instagram Post	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Photos of children; not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim even if outside class period; "Photos of children" is not a proper basis for objection.	-	
0435	META- FRASCO-0000077945	10/3/2018	T. Gamino Facebook Post	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Photo of child; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim even if outside class period; "Photos of children" is not a proper basis for objection.	-	
0436	n/a	9/5/2018	App photo reflecting 36 weeks into pregnancy	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim even if outside class period; "Photos of children" is not a proper basis for objection.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0437	META- FRASCO-0000321573	9/5/2018	Meta Platforms Business Record of app photo about 36 weeks into pregnancy	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim.	-	
0438	n/a	9/13/2018	App photo reflecting 36 weeks into pregnancy, with comment	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim.	-	
0439	FLO-GAMINO-0000364	12/8/2022	T. Gamino Instagram Post	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim; "Ultrasound photo" is not a proper basis for objection.	-	
0440	FLO-GAMINO-0005681	5/9/2018	Email from Babycenter to T. Gamino re Your pregnancy: 19 weeks	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-	
0441	FLO-GAMINO-0004751	1/21/2018	Email from Everyday Health to T. Gamino re Daily Digest for the July 2015 Babies Group	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim.	-	
0442	n/a	2/22/2019	Wall Street Journal, "You Give Apps Sensitive Personal Information. Then They Tell Facebook"	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	-		-	
0443	n/a	2/22/2019	AP News Report, "Apps give Facebook sensitive health and other data"	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	-		-	
0444	FLO-GAMINO-0000320	4/11/2018	Email with subject line: Important updates on Google Analytics Data Retention and the General Data Protection Regulation (GDPR)	Confidential			T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0445	FLO-GAMINO-0000366	7/9/2020	Email from Google to Empire Kiddies re Empire, complete your privacy checkup	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period ( <i>see</i> Rules 401, 402)	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages. Relevant to witness credibility and CIPA 632 claim, even if outside class period.	-	
0446	n/a	6/22/2018	Flo Terms of Service, effective as of June 22, 2018	n/a			T. Gamino; Plaintiffs; Flo Witness	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; See purposes as to the underlying documents	Plaintiffs incorporate their challenges to the admissibility of the underlying documents.	Though the exhibit is duplicative, it will be helpful for purposes of cross-examination, as the exhibit was used with the witness during her deposition.	-	
0447	n/a	n/a	Tease podcast Instagram page	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of undue prejudice	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential prejudice. Relevant to witness credibility and CIPA 632 claim.	-	
0448	META- FRASCO-0000078876	1/5/2019	T. Gamino Instagram Post	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Photo of child; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim; "Photo of child" is not a proper basis for objection.	-	
0449	n/a	1/24/2021	T. Gamino Instagram Post	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim even if outside class period.	-	
0450	META- FRASCO-0000077834	9/25/2019	T. Gamino Instagram Post	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of undue prejudice	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential prejudice. Relevant to witness credibility and CIPA 632 claim; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
0451			Autumn Meigs 1/5/2023 Deposition Exhibit 39 - Screenshot of Autumn's Apple Watch				A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0452			Autumn Meigs 1/5/2023 Deposition Exhibit 40 - Screenshot of Autumn's Apple Watch				A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion	-	
0453			Autumn Meigs 1/6/2023 Deposition Exhibit 41 - Facebook post (Highly Confidential)				A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0454			Autumn Meigs 1/6/2023 Deposition Exhibit 42 - Public post (Highly Confidential)				A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0455			Autumn Meigs 1/6/2023 Deposition Exhibit 43 - GoodRx privacy policy				A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0456			Justine Pietrzyk 1/27/2023 Deposition Exhibit 156 - Interrogatory responses				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0457			Justine Pietrzyk 1/27/2023 Deposition Exhibit 157 - Supplemental Responses and Objections				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0458			Justine Pietrzyk 1/27/2023 Deposition Exhibit 158 - Verification page				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0459	FLO-00000211		Flo Consent screen				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Lack of date of document and therefore not relevant; cumulative	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0460	FLO-00002762		Justine Pietrzyk 1/27/2023 Deposition Exhibit 160 - Flo's privacy policy				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Document undated and therefore not relevant; cumulative	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0461			Justine Pietrzyk 1/27/2023 Deposition Exhibit 162 - Clue's privacy policy				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0462			Justine Pietrzyk 1/27/2023 Deposition Exhibit 163 - Email				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0463			Justine Pietrzyk 1/27/2023 Deposition Exhibit 164 - Ovia privacy policy				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0464			Justine Pietrzyk 1/27/2023 Deposition Exhibit 165 - Email				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0465			Justine Pietrzyk 1/27/2023 Deposition Exhibit 166 - Email				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0466			Justine Pietrzyk 1/27/2023 Deposition Exhibit 167 - BabyCenter's privacy policy				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0467			Justine Pietrzyk 1/27/2023 Deposition Exhibit 168 - Email				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0468			Justine Pietrzyk 1/27/2023 Deposition Exhibit 169 - Twitter				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0469			Justine Pietrzyk 1/27/2023 Deposition Exhibit 170 - Twitter				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0470			Justine Pietrzyk 1/27/2023 Deposition Exhibit 171 - Instagram				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0471			Justine Pietrzyk 1/27/2023 Deposition Exhibit 172 - Instagram				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; unfair prejudice; inadmissible character evidence	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0472			Justine Pietrzyk 1/27/2023 Deposition Exhibit 173 - Email				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0473			Justine Pietrzyk 1/27/2023 Deposition Exhibit 174 - LinkedIn				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0474			Justine Pietrzyk 1/27/2023 Deposition Exhibit 175 - Facebook post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0475			Justine Pietrzyk 1/27/2023 Deposition Exhibit 176 - Facebook post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0476			Justine Pietrzyk 1/27/2023 Deposition Exhibit 177 - Facebook post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0477			Justine Pietrzyk 1/27/2023 Deposition Exhibit 178 - Instagram post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0478			Justine Pietrzyk 1/27/2023 Deposition Exhibit 179 - Instagram post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0479			Justine Pietrzyk 1/27/2023 Deposition Exhibit 180 - Facebook post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0480			Justine Pietrzyk 1/27/2023 Deposition Exhibit 181 - Facebook post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0481			Justine Pietrzyk 1/27/2023 Deposition Exhibit 182 - Business record				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0482			Justine Pietrzyk 1/27/2023 Deposition Exhibit 183 - Instagram post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; unfair prejudice; inadmissible character evidence	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0483			Justine Pietrzyk 1/27/2023 Deposition Exhibit 184 - Instagram post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; unfair prejudice; inadmissible character evidence	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0484			Justine Pietrzyk 1/27/2023 Deposition Exhibit 185 - Instagram post				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0485			Justine Pietrzyk 1/27/2023 Deposition Exhibit 186 - Email				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0486			Justine Pietrzyk 1/27/2023 Deposition Exhibit 187 - Google's privacy policy				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0487			Leah Ridgway 1/13/2023 Deposition Exhibit 73 - Interrogatory responses				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0488			Leah Ridgway 1/13/2023 Deposition Exhibit 74 - List of items				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; outside class period	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim; not barred by class period because of Plaintiffs' pursuit of punitive damages	-	
0489			Leah Ridgway 1/13/2023 Deposition Exhibit 75 - Facebook post				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0490			Leah Ridgway 1/13/2023 Deposition Exhibit 76 - Facebook post				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion	-	
0491			Leah Ridgway 1/13/2023 Deposition Exhibit 77 - Photo				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0492			Leah Ridgway 1/13/2023 Deposition Exhibit 78 - Facebook post				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	



EXHIBIT A  
Joint Preliminary Trial Exhibit List  
Frasco v. Flo Health, Inc., et al, (Case No. 3:21-cv-00757-JD)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0493			Leah Ridgway 1/13/2023 Deposition Exhibit 79 - Facebook post				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0494			Leah Ridgway 1/13/2023 Deposition Exhibit 80 - Facebook post				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0495			Leah Ridgway 1/13/2023 Deposition Exhibit 81 - Comments				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion	-	
0496			Leah Ridgway 1/13/2023 Deposition Exhibit 82 - Comments				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion	-	
0497			Leah Ridgway 1/13/2023 Deposition Exhibit 83 - Comments				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0498			Leah Ridgway 1/13/2023 Deposition Exhibit 84 - Pinterest				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim	-	
0499			Leah Ridgway 1/13/2023 Deposition Exhibit 87 - Responses to Interrogatories				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0500			Leah Ridgway 1/13/2023 Deposition Exhibit 88 - Amended Objections and Responses				L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs			-	
0501	FLO-WELLMAN-0002400	8/17/2015	Email from Amazon to S. Wellman re Your Amazon.com order	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim, even if outside class period.	-	
0502	n/a	n/a	S. Wellman LinkedIn Profile	n/a			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility, Cross-Examination of the Named Plaintiffs	Employment related; relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim; "Employment related" is not a proper basis for objection.	-	
0503		1/1/2023	Indiegogo's Privacy Policy Effective Date: 1/1/2023				S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	Employer's privacy policy; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim; "Employer's privacy policy" is not a proper basis for objection.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0504		5/6/2022	Indiegogo's Cookie Policy Effective Date: 5/6/2022				S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	Employer's privacy policy; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim; "Employer's privacy policy" is not a proper basis for objection.	-	
0505	FLO-WELLMAN-0002791	8/17/2007	Email from Google to S. Davidson re Thank you from Google!	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Email related to job application; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.	-	
0506	FLO-WELLMAN-0002792	9/10/2007	Email from Google to S. Davidson re Thank you from Google!	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Witness Credibility	Email related to job application; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.	-	
0507	FLO-WELLMAN-0002668	7/3/2012	Email from Google to S. Davidson re Thanks for applying to Google	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Witness Credibility	Email related to job application; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.	-	
0508	FLO-WELLMAN-0002871	6/25/2019	Email from Google to S. Davidson re Thanks for your interest in Google	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Witness Credibility	Email related to job application; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.	-	
0509	FLO-WELLMAN-0002703	10/11/2010	Email from Google Adsense to S. Davidson re Welcome to Google Adsense	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Witness Credibility	Not relevant to any claim or defense; probative value substantially outweighed by danger of confusing the issues	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility, even if outside class period.	-	
0510	FLO-WELLMAN-0001727	3/22/2018	Email with subject line: Important updates about the General Data Protection	Confidential			S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
0511	n/a	n/a	S. Wellman Poshmark site	n/a			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim; not duplicative because this document was used with witness at deposition and will help for purposes of impeachment. Relevant to witness credibility and CIPA 632 claim.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0512	n/a	n/a	S. Wellman Pinterest site	n/a			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-	
0513		12/20/2021	Indiegogo's Terms of Use Effective 12/20/2021				S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	Employer's terms of use; not relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim, even if outside class period; "Employer's terms of use" is not a proper basis for objection.	-	
0514	FLO-00094826	8/24/2018	Flo: Women's Mobile Health Product - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0515		3/31/2025	Flo Health - About Us - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0516		3/31/2025	Flo Health - Medical Expertise - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0517		3/31/2025	Flo Health - Pass It On Project - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0518		3/31/2025	Flo Health - Flo Accuracy - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0519		3/31/2025	Flo Health - Product Tour - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0520		3/31/2025	Flo Health - Tracking Cycle - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0521		3/31/2025	Flo Health - Getting Pregnant - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0522		3/31/2025	Flo Health - Prenancy - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0523		3/31/2025	Flo Health - App Reviews - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0524		3/31/2025	Flo Health - Anonymous Mode - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0525		3/31/2025	Flo Health - Flo Premium - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0526		3/31/2025	Flo Health - Secret Chats - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0527		3/31/2025	Flo Health - Symptom Checker - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0528		3/31/2025	Flo Health - Health Library - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0529		3/31/2025	Flo Health - Health 360 - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0530		3/31/2025	Flo Health - Health Library - Getting Pregnancy - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0531		3/31/2025	Flo Health - Health Library - Pregnancy - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0532		3/31/2025	Flo Health - Health Library - Being a mom - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0533		3/31/2025	Flo Health - Health Library - LGBTQ+ - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	

EXHIBIT A  
Joint Preliminary Trial Exhibit List  
Frasco v. Flo Health, Inc., et al, (Case No. 3:21-cv-00757-JD)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0534		3/31/2025	Flo Health - Health Library - Quizzes - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0535		3/31/2025	Flo Health - Calculators - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0536		3/31/2025	Flo Health - Ovluation Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0537		3/31/2025	Flo Health - Pregnancy Test Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0538		3/31/2025	Flo Health - Mesntrual Cycle Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0539		3/31/2025	Flo Health - Period Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0540		3/31/2025	Flo Health - Implantation Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0541		3/31/2025	Flo Health - Pregnancy Weeks To Months Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0542		3/31/2025	Flo Health - Pregarancy Due Date Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0543		3/31/2025	Flo Health - IVF and FET Due Date Calculator - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0544		3/31/2025	Flo Health - Due Date Calculator By Ultrasound - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0545	FLO-00104754	n/a	"Welcome to Flo" Terms of Use and Privacy Policy Agreement Page	Confidential			Plaintiffs; Flo Witness; G. Zervas; C. Karkanias; RM Scrobov; L. Lydon	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages; Relevant to Consent	-		-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0546		6/30/2022	Flo. (2022, June 30). "Flo, the leading female health app, launches 'Anonymous Mode' to further protect reproductive health information in wake of Roe v. Wade decision." - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0547		12/12/2024	Wickham, A. et al. (2024, December 12). "Exploring Self-Reported Symptoms for Developing and Evaluating Digital Symptom Checkers for Polycystic Ovarian Syndrome, Endometriosis, and Uterine Fibroids: Exploratory Survey Study." JMIR Formative Research. <a href="https://formative.jmir.org/2024/1/e65469">https://formative.jmir.org/2024/1/e65469</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0548		5/25/2021	Flo. (2021, May 25). "Flo Announces the Research Project on the Effect of Weight Changes on Fertility and Cycle." <a href="https://flo.health/collaborations/academic-research/flo-announces-research-project-on-the-effect-of-weight-changes-on-fertility">https://flo.health/collaborations/academic-research/flo-announces-research-project-on-the-effect-of-weight-changes-on-fertility</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0549		6/25/2024	Prentice, C. et al. (2024, June 25). "Methods for evaluating the efficy and efectiveness of direct-to-consumer mobile health apps: a scoping review." BMC Digital Health. (2024) 2:31, <a href="https://doi.org/10.1186/s44247-024-00092-x">https://doi.org/10.1186/s44247-024-00092-x</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0550		4/21/2022	Bajaj, M. (2022, April 21). "Rates of self-reported postpartum depressive symptoms in the United States before and after the start of the COVID-19 pandemic." Journal of Psychiatric Research 151 (2022) 108–112.				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0551		12/31/2021	Bradshaw, H. et al. (2021, December 31). "Risk factors associated with postpartum depressive symptoms: A multinational study." Journal of Affective Disorders 301 (2022) 345–351.				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0552		8/26/2022	Hantsoo, L. et al. (2022, August 26). "Premenstrual symptoms across the lifespan in an international sample: data from a mobile application." Archives of Women's Mental Health (2022) 25:903–910 <a href="https://doi.org/10.1007/s00737-022-01261-5">https://doi.org/10.1007/s00737-022-01261-5</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0553		0/0/2023	Flo. (2023). "Mind the gaps: Menstrual and reproductive misinformation in the UK in 2023." <a href="https://flo.health/landings/reproductive-health-report-uk">https://flo.health/landings/reproductive-health-report-uk</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0554		4/17/2025	Flo. "Reproductive Health." <a href="https://flo.health/experts/reproductive-health">https://flo.health/experts/reproductive-health</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0555		3/3/2021	Jain, T. et al. "Characterization of polycystic ovary syndrome among Flo app users around the world." Reproductive Biology and Endocrinology (2021) 19:36 <a href="https://doi.org/10.1186/s12958-021-00719-y">https://doi.org/10.1186/s12958-021-00719-y</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0556		5/7/2024	Mengelkoch, S. et al. (2024, May 7). "Longitudinal associations between women's cycle characteristics and sexual motivation using Flo cycle tracking data." Scientific Reports (2024) 14:10513, <a href="https://doi.org/10.1038/s41598-024-60599-1">https://doi.org/10.1038/s41598-024-60599-1</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0557		5/2/2024	Cunningham, A.C., et al. "Efficacy of the Flo App in Improving Health Literacy, Menstrualand General Health, and Well-Being in Women: Pilot Randomized Controlled Trial." JMIR Mhealth Uhealth (2024) 12:54124 <a href="https://mhealth.jmir.org/2024/1/e54124">https://mhealth.jmir.org/2024/1/e54124</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0558		12/5/2023	Peven, K. et al. "Assessment of a Digital Symptom Checker Tool's Accuracy in Suggesting Reproductive Health Conditions: Clinical Vignettes Study." JMIR Mhealth Uhealth (2023) 11:46718, <a href="https://mhealth.jmir.org/2023/1/e46718">https://mhealth.jmir.org/2023/1/e46718</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0559		4/26/2023	Zhaunova, L. et al. "Characterization of Self-reported Improvements in Knowledgeand Health Among Users of Flo Period Tracking App: Cross-sectional Survey." JMIR Mhealth Uhealth (2023) 11:40427, <a href="https://mhealth.jmir.org/2023/1/e40427">https://mhealth.jmir.org/2023/1/e40427</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0560		1/10/2024	Kazlou, A. et al. "Effects of stress on pain in females using a mobile health app in the Russia-Ukraine conflict." Nature NPJ Mental Health Research (2024) 3:2; <a href="https://doi.org/10.1038/s44184-023-00043-w">https://doi.org/10.1038/s44184-023-00043-w</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0561		6/24/2020	Grieger, J.A., and Norman, R.J. "Menstrual Cycle Length and Patterns in a Global Cohort of Women Using a Mobile Phone App: Retrospective Cohort Study." J Med Internet Res (2020) 22, iss. 6, 17109, <a href="http://www.jmir.org/2020/6/e17109/">http://www.jmir.org/2020/6/e17109/</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0562		11/30/2022	Ponzo, S. et al. "Menstrual cycle-associated symptoms and workplace productivity in US employees: A cross-sectional survey of users of the Flo mobile phone app." Digital Health (2022) 8:1-12.				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0563		2/25/2025	Cunningham, A. "Perimenopause symptoms, severity, and healthcare seeking in women in the US." NPJ Women's Health (2025) 3:12, <a href="https://doi.org/10.1038/s44294-025-00061-3">https://doi.org/10.1038/s44294-025-00061-3</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0564		5/3/2024	Cunningham, A. et al. "Chronicling menstrual cycle patterns across the reproductive lifespan with real-world data." Scientific Reports (2024) 14:10172; <a href="https://doi.org/10.1038/s41598-024-60373-3">https://doi.org/10.1038/s41598-024-60373-3</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0565		1/8/2025	Goddard, F. et al. "Female sexual response among Flo app users in the United States." NPJ Women's Health (2025) 3:2; <a href="https://doi.org/10.1038/s44294-024-00051-x">https://doi.org/10.1038/s44294-024-00051-x</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0566		12/3/2020	Flo. (2020, December 3). "Flo Health, Bayer AG and Help Group Research Collaboration partner to raise awareness about Heavy Menstrual Bleeding." <a href="https://flo.health/collaborations/in-novations/flo-health-and-bayer-help-group-research-collaboration">https://flo.health/collaborations/in-novations/flo-health-and-bayer-help-group-research-collaboration</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0567		10/21/2021	Flo. (2021, October 21). "Flo at the FIGO World Congress: How real world data can improve women's health." <a href="https://flo.health/newsroom/flo-at-the-figo-world-congress">https://flo.health/newsroom/flo-at-the-figo-world-congress</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0568		2/12/2022	Flo. (2022, February 12). "Flo Offers Free Premium Subscriptions for US-based Obstetricians and Gynecologists." <a href="https://flo.health/newsroom/free-premium-subscriptions-for-obgyns">https://flo.health/newsroom/free-premium-subscriptions-for-obgyns</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0569		1/9/2025	ELTA. (2025, January 9). "'Invest in Lithuania': 351 million reached the country last year, foreign investments of EUR 3 thousand will be created, jobs." <a href="https://madeinvilnius.lt/en/business/Vilnius-market/invest-in-Lithuania-last-year-the-country-reached-EUR-351-million-foreign-investment-will-create-over-3-thousand-jobs/">https://madeinvilnius.lt/en/business/Vilnius-market/invest-in-Lithuania-last-year-the-country-reached-EUR-351-million-foreign-investment-will-create-over-3-thousand-jobs/</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0570		12/19/2017	Park, A. (2017, December 19). "Emily Ratajkowski: Periods Don't Have to 'Be Something You Hide.'" Glamour. <a href="https://www.glamour.com/story/emily-ratajkowski-period-story">https://www.glamour.com/story/emily-ratajkowski-period-story</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0571		2/9/2018	Document containing link to YouTube video, titled, "Let's Talk About it. Period. With Emily Ratajkowsky." <a href="https://www.youtube.com/watch?v=sFF15iqn8Po">https://www.youtube.com/watch?v=sFF15iqn8Po</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0572		6/14/2021	Flo. (2021, June 14). "Flo Health Inc. announces world-class parental leave policies." <a href="https://flo.health/newsroom/flo-health-world-class-parental-leave-policies">https://flo.health/newsroom/flo-health-world-class-parental-leave-policies</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0573		4/10/2025	Flo. (2025, April 10). "Flo Pass It On Project - Why we're gifting to worldwide." <a href="https://flo.health/pass-it-on-project">https://flo.health/pass-it-on-project</a>				A. Klepchukova; D. Gurski; T. Orlova	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0574			Document titled, "Why we made Flo Premium completely free for one billion women worldwide."				A. Klepchukova; D. Gurski; T. Orlova	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Authenticity	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0575		2/27/2025	Femtech Insider. (2025, February 27). "Flo Study Reveals Young Women Experience Perimenopause Symptoms Earlier Than Expected." <a href="https://femtechinsider.com/flo-study-reveals-young-women-experience-perimenopause-symptoms-earlier-than-expected/">https://femtechinsider.com/flo-study-reveals-young-women-experience-perimenopause-symptoms-earlier-than-expected/</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0576		2/25/2025	Flo. (2025, February 25). "It's Not Just Hot Flashes: Flo Study Reveals Early Psychological Impact of Perimenopause," published on the Flo website. <a href="https://flo.health/newsroom/flo-study-reveals-early-psychological-impact-of-perimenopause">https://flo.health/newsroom/flo-study-reveals-early-psychological-impact-of-perimenopause</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0577		2/25/2025	PR Newswire. (2025, February 25). "It's Not Just Hot Flashes: Flo Study Reveals Early Psychological Impact of Perimenopause."				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0578		2/25/2025	Price, S. (2025, February 25). "Research roundup: biodegradable contraceptive to be developed, impact of the microbiome on fertility and more." Fem Tech World. <a href="https://www.femtechworld.co.uk/news/research-roundup-biodegradable-contraceptive-to-be-developed-impact-of-the-microbiome-on-fertility-and-more/">https://www.femtechworld.co.uk/news/research-roundup-biodegradable-contraceptive-to-be-developed-impact-of-the-microbiome-on-fertility-and-more/</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0579		2/28/2025	Thompson, D. (2025, February 28). "Young Women Suffer Menopause Symptoms In Silence, Study Says." U.S. News. <a href="https://www.usnews.com/news/health-news/articles/2025-02-28/young-women-suffer-menopause-symptoms-in-silence-study-says">https://www.usnews.com/news/health-news/articles/2025-02-28/young-women-suffer-menopause-symptoms-in-silence-study-says</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0580		2/25/2025	Kelly, S. (2025, February 25). "Your 30s Aren't Too Early For Perimenopause – But Many Women Don't Realise It." Huffington Post. <a href="https://www.huffingtonpost.co.uk/entry/signs-of-perimenopause-in-thirties_uk_67bdb1a8e4b088756003ea9f?g1b">https://www.huffingtonpost.co.uk/entry/signs-of-perimenopause-in-thirties_uk_67bdb1a8e4b088756003ea9f?g1b</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0581		5/10/2021	Flo. (2021, May 10). "Flo Health App Launches New Slack Emojis to Encourage Period Talk in the Workplace." <a href="https://flo.health/newsroom/flo-launches-new-slack-emojis">https://flo.health/newsroom/flo-launches-new-slack-emojis</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0582		4/13/2021	Flo. (2021, April 13). "Flo Partners with Phenomenal to Fight Period Stigma." <a href="https://flo.health/newsroom/flo-partners-with-phenomenal-to-fight-period-stigma">https://flo.health/newsroom/flo-partners-with-phenomenal-to-fight-period-stigma</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0583		10/15/2021	Flo. (2021, October 15). "Flo Health Launches Dedicated Pregnancy Loss Policy." <a href="https://flo.health/newsroom/flo-pregnancy-loss-policy">https://flo.health/newsroom/flo-pregnancy-loss-policy</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0584		12/3/2020	Flo. (2020, December 3). "Flo Partners with SEUD to Raise Awareness About Endometriosis." <a href="https://flo.health/collaborations/content/flo-partners-with-seud-to-raise-awareness-about-endometriosis">https://flo.health/collaborations/content/flo-partners-with-seud-to-raise-awareness-about-endometriosis</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0585		12/3/2020	Flo. (2020, December 3). "Flo Signs Cooperation Agreement with EBCOG." <a href="https://flo.health/collaborations/content/flo-signs-cooperation-agreement-with-ebcog">https://flo.health/collaborations/content/flo-signs-cooperation-agreement-with-ebcog</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0586		0/0/2024	Pham, T. (2024). "Time-Saving Strategies for OB-GYNs." Flo Health Inc.				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0587		5/16/2023	Roberts, A. (2023, May 16). "A femtech company found itself in the middle of the Ukraine invasion. Here's how sticking by their employees massively paid off—and helped advance science." Fortune. <a href="https://fortune.com/europe/2023/05/16/femtech-ukraine-invasion-employees-science-tech-ann-roberts/">https://fortune.com/europe/2023/05/16/femtech-ukraine-invasion-employees-science-tech-ann-roberts/</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0588		3/8/2022	Flo. (2022, March 8). "Supporting our Flo community in Ukraine." <a href="https://flo.health/newsroom/flo-ukraine-support">https://flo.health/newsroom/flo-ukraine-support</a>				A. Klepchukova; D. Gurski; T. Orlova	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0589		2/16/2018	Flo. (2018, February 16). "Cooperation Agreement Between Flo and UNFPA Signed." <a href="https://flo.health/collaborations/content/flo-and-unfpa-signed-cooperation-agreement">https://flo.health/collaborations/content/flo-and-unfpa-signed-cooperation-agreement</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	

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0590		3/5/2020	Flo. (2020, March 5). "Dr. Natalia Kanem, UNFPA Executive Director, Visits Flo's Office." <a href="https://flo.health/newsroom/unfpa-director-visits-flo">https://flo.health/newsroom/unfpa-director-visits-flo</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0591		2/2/2022	Askham, G. (2022, February 2). "After 357,657 votes, the winners of GLAMOUR's Wellness Power List 2022 are in! These are the 52 wellness buys really worth your money." Glamour Magazine. <a href="https://www.glamourmagazine.co.uk/gallery/wellness-power-list-2022">https://www.glamourmagazine.co.uk/gallery/wellness-power-list-2022</a>				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0592		1/8/2019	Flo. (2019, January 8). "Flo Has Been Selected as a CES 2019 Innovation Awards Honoree." <a href="https://flo.health/newsroom/flo-ces-2019-innovation-awards-honoree">https://flo.health/newsroom/flo-ces-2019-innovation-awards-honoree</a>				D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0593		1/8/2019	Flo. (2019, January 8). "Flo Announced as a Silver Honoree of 20th Anniversary Digital Health Awards Fall Session 2018." <a href="https://flo.health/newsroom/flo-silver-2018-digital-health-awards">https://flo.health/newsroom/flo-silver-2018-digital-health-awards</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0594		5/2/2023	Flo. (2023, May 2). "Flo Health's "Anonymous Mode" feature named as a finalist in the Rapid Response category of Fast Company's 2023 World Changing Ideas Awards." <a href="https://flo.health/newsroom/flo-health-anonymous-mode">https://flo.health/newsroom/flo-health-anonymous-mode</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0595		4/16/2025	Zara, C. (2025, April 16). "World Changing Ideas Awards 2023: Rapid Response finalists and honorable mentions." Fast Company. <a href="https://www.fastcompany.com/90870709/world-changing-ideas-rapid-response-2023">https://www.fastcompany.com/90870709/world-changing-ideas-rapid-response-2023</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0596		5/2/2024	Editorial Team. (2024, May 2). "Femtech World Awards: Winners announced." Femtech World.				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0597		11/15/2022	Bryant, J. "Dechert's work on Flo's "Anonymous Mode," Amurabi's design of King's privacy notice win 2022 IAPP Privacy Innovation Awards." IAPP. <a href="https://iapp.org/news/a/flos-anonymous-mode-kings-privacy-notice-win-2022-hpe-iapp-privacy-innovation-awards/">https://iapp.org/news/a/flos-anonymous-mode-kings-privacy-notice-win-2022-hpe-iapp-privacy-innovation-awards/</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	

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0598		11/13/2024	PICCASO Awards. (2024, November 13). "PICCASO Awards Europe 2024 Celebrates Industry Leaders in Data, Privacy, and Information Security Excellence." <a href="https://www.piccasoawards.com/blog/piccaso-awards-europe-2024-celebrates-industry-leaders-in-data-privacy-and">https://www.piccasoawards.com/blog/piccaso-awards-europe-2024-celebrates-industry-leaders-in-data-privacy-and</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0599		4/16/2025	PICCASO Awards. (2025, April 16). "Shortlist for the 2024 Awards." <a href="https://www.piccasoawards.com/2024-shortlist">https://www.piccasoawards.com/2024-shortlist</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0600		7/17/2023	PICCASO Awards. (2023, July 17). "PICCASO Privacy PICCASO Privacy Awards Europe Shortlist for 2023 Revealed Awards Europe Shortlist for 2023 Revealed." <a href="https://www.piccasoawards.com/blog/piccaso-privacy-awards-europe-shortlist-for-2023-revealed">https://www.piccasoawards.com/blog/piccaso-privacy-awards-europe-shortlist-for-2023-revealed</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0601		8/27/2018	Flo. (2018, August 27). "OWHealth Chosen as a 2017 Red Herring Top 100 North America Winner." <a href="https://flo.health/newsroom/owhealth-chosen-as-a-2017-red-herring-top-100-north-america-winner">https://flo.health/newsroom/owhealth-chosen-as-a-2017-red-herring-top-100-north-america-winner</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0602		12/6/2023	The Drum Editorial. (2023, December 6). "Flo Health on how its content drove daily app usage with pregnant mothers." The Drum. <a href="https://www.thedrum.com/news/2023/12/06/flo-health-how-its-content-drove-daily-app-usage-with-pregnant-mothers">https://www.thedrum.com/news/2023/12/06/flo-health-how-its-content-drove-daily-app-usage-with-pregnant-mothers</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0603		11/2/2023	Flo. (2023, November 2). "Flo Health's "Anonymous Mode" feature recognized as one of TIME's List of Best Inventions 2023." <a href="https://flo.health/newsroom/time-best-inventions-2023">https://flo.health/newsroom/time-best-inventions-2023</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0604		3/15/2021	Flo. (2021, March 15). "Building a secure space for millions of women worldwide through 1Password." <a href="https://flo.health/newsroom/building-a-secure-space-for-millions-of-women-worldwide-through-1password">https://flo.health/newsroom/building-a-secure-space-for-millions-of-women-worldwide-through-1password</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0605		4/16/2025	Flo. (2025, April 16). "An added layer of privacy for your personal data." <a href="https://flo.health/product-tour/anonymous-mode">https://flo.health/product-tour/anonymous-mode</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	

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0606		9/14/2022	Flo. (2022, September 14). "Flo 'Anonymous Mode' Now Live, Offering Significant Advancement in the Privacy and Security of Reproductive Health Data." <a href="https://flo.health/newsroom/flo-anonymous-mode-now-live">https://flo.health/newsroom/flo-anonymous-mode-now-live</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0607		5/1/2024	Flo. (2024, May 1). "Flo Anonymous Mode overview."				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0608		6/28/2023	Flo. (2023, June 28). "Flo Health Open-Sources Award-Winning Anonymous Mode Feature, Encourages Stricter Privacy for Femtech Industry." <a href="https://flo.health/newsroom/anonymous-mode-feature">https://flo.health/newsroom/anonymous-mode-feature</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0609		4/16/2025	Flo. (2025, April 16). "Flo's responsible vulnerability disclosure program." <a href="https://flo.health/responsible-vulnerability-disclosure-program">https://flo.health/responsible-vulnerability-disclosure-program</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0610		8/4/2021	HackerOne. (2021, August 4). "One Month of Learnings from Flo Health's Bug Bounty Program: A Q&A with CISO, Leo Cunningham." <a href="https://www.hackerone.com/blog/one-month-learnings-flo-healths-bug-bounty-program-qa-ciso-leo-cunningham">https://www.hackerone.com/blog/one-month-learnings-flo-healths-bug-bounty-program-qa-ciso-leo-cunningham</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0611		7/9/2019	Flo. (2019, July 9). "How Flo Helps Safeguard Customer Data With Cloudflare, One of the World's Largest Cloud Network Platforms." <a href="https://flo.health/newsroom/how-flo-helps-safeguard-customer-data-with-cloudflare">https://flo.health/newsroom/how-flo-helps-safeguard-customer-data-with-cloudflare</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0612		8/3/2022	Flo. (2022, August 3). "Flo Achieves ISO 27001 Certification Becoming First Period & Ovulation Tracker to Meet World-Class Security Standards." <a href="https://flo.health/newsroom/flo-achieves-iso-27001-certification">https://flo.health/newsroom/flo-achieves-iso-27001-certification</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0613		1/29/2024	Flo. (2024, January 29). "Flo Health Sets New Standards in Female Health Tech with Dual ISO 27701 and ISO 27001 Certifications." <a href="https://flo.health/newsroom/flo-dual-iso-27001-certifications">https://flo.health/newsroom/flo-dual-iso-27001-certifications</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0614		4/17/2025	West, P. (2025, April 17). "Flo Health Appoints Cybersecurity Leaders." Startups Magazine. <a href="https://startupsmagazine.co.uk/index.php/article-flo-health-appoints-cybersecurity-leaders">https://startupsmagazine.co.uk/index.php/article-flo-health-appoints-cybersecurity-leaders</a>				D. Gorski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	

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0615		1/21/2025	Flo. (2025, January 21). "Flo Health Appoints Cybersecurity Leaders to Privacy & Security Advisory Board, Reinforcing Flo's Commitment to Protecting Sensitive Health Data." <a href="https://flo.health/newsroom/flo-health-appoints-cybersecurity-leaders">https://flo.health/newsroom/flo-health-appoints-cybersecurity-leaders</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0616		1/24/2023	Flo. (2023, January 24). "Flo Health appoints new executive and launches Privacy & Security Advisory Board to further its commitment to protecting its 50M monthly active users' data." <a href="https://flo.health/newsroom/flo-launches-privacy-and-security-advisory-board">https://flo.health/newsroom/flo-launches-privacy-and-security-advisory-board</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	-	
0617			Screenshot of Flo app Privacy Intent page titled, "Flo privacy explained."				S. Schumacher; M. Scrobov; C. Karkanias	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0618		4/17/2025	Screenshot of Flo app pages on April 17, 2025, beginning with the title, "You control your data."				S. Schumacher; M. Scrobov; C. Karkanias	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0619		6/28/2021	Flo. (2021, June 28). "Reinforcing the Privacy and Security by Design Approach Through Collaboration with PwC." <a href="https://flo.health/security/flo-collaboration-with-pwc">https://flo.health/security/flo-collaboration-with-pwc</a>				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0620		5/2/2023	PR Newswire. (2023, May 2). "Flo Health's "Anonymous Mode" feature named as a finalist in the ... – PR Newswire." Business Telegraph. <a href="https://businesstelegraph.co.uk/flo-healths-anonymous-mode-feature-named-as-a-finalist-in-the-pr-newswire/">https://businesstelegraph.co.uk/flo-healths-anonymous-mode-feature-named-as-a-finalist-in-the-pr-newswire/</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0621		9/14/2022	Westman, N. and Faife, C. (2022, September 14). "Flo period tracker launches 'Anonymous Mode' to fight abortion privacy concerns." The Verge. <a href="https://www.theverge.com/2022/9/14/23351957/flo-period-tracker-privacy-anonymous-mode">https://www.theverge.com/2022/9/14/23351957/flo-period-tracker-privacy-anonymous-mode</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0622		9/14/2022	Sorina, M. (2022, September 14). "Flo's Anonymous Mode goes live in a bid to improve data security for millions of users." Fem Tech World. <a href="https://www.femtechworld.co.uk/news/flos-anonymous-mode-goes-live-in-a-bid-to-improve-data-security-for-millions-of-users/">https://www.femtechworld.co.uk/news/flos-anonymous-mode-goes-live-in-a-bid-to-improve-data-security-for-millions-of-users/</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0623		9/14/2022	Moon, M. (2022, September 14). "Period tracker app Flo launches 'Anonymous Mode' for iOS devices." Engadget. <a href="https://www.engadget.com/flo-anonymous-mode-is-now-available-on-ios-130039242.html?_fsig=4luEsCj16D7DK3yflu53PQ---A">https://www.engadget.com/flo-anonymous-mode-is-now-available-on-ios-130039242.html?_fsig=4luEsCj16D7DK3yflu53PQ---A</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0624		9/15/2022	Aswell, S. (2022, September 15). "Period Tracker Flo Launches Anonymous Mode In The Wake Of 'Roe V. Wade'." Scary Mommy. <a href="https://www.scarymommy.com/lifestyle/period-tracker-flo-anonymous-mode">https://www.scarymommy.com/lifestyle/period-tracker-flo-anonymous-mode</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0625		9/14/2022	Ashcraft, K. R. (2022, September 14). Document titled, "Period Tracker App Flo Launches First-Ever 'Anonymous Mode' to Protect User Privacy." Jezebel.				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0626		9/14/2022	Inverse. (2022, September 14). "Period tracker Flo adds 'Anonymous Mode' amid data privacy concerns." <a href="https://www.inverse.com/input/tech/flo-anonymous-mode-period-tracker-ios-roe-v-wade">https://www.inverse.com/input/tech/flo-anonymous-mode-period-tracker-ios-roe-v-wade</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0627		9/15/2022	Pifer, R. (2022, September 15). "Period tracker Flo launches anonymous mode amid post-Roe privacy concerns." Healthcare Dive. <a href="https://www.healthcaredive.com/news/flo-anonymous-mode-period-tracker-app-abortion-roe/631926/">https://www.healthcaredive.com/news/flo-anonymous-mode-period-tracker-app-abortion-roe/631926/</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0628		9/16/2022	Olsen, E. (2022, September 9). "Period tracking app Flo releases anonymous mode and more digital health briefs." <a href="https://www.mobihealthnews.com/news/period-tracking-app-flo-releases-anonymous-mode-and-more-digital-health-briefs">https://www.mobihealthnews.com/news/period-tracking-app-flo-releases-anonymous-mode-and-more-digital-health-briefs</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0629		9/14/2022	Malik, A. (2022, September 14). "Period tracking app Flo rolls out 'Anonymous Mode' on iOS, Android launch coming next month." Tech Crunch. <a href="https://techcrunch.com/2022/09/14/period-tracking-app-flo-anonymous-mode/?tpec=teplustwitter">https://techcrunch.com/2022/09/14/period-tracking-app-flo-anonymous-mode/?tpec=teplustwitter</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0630		9/14/2022	Kan, M. (2022, September 14). "Period-Tracking App Flo Adds 'Anonymous Mode' After Roe v. Wade Overturn." PC Mag. <a href="https://uk.pcmag.com/mobile-apps/142640/period-tracking-app-flo-adds-anonymous-mode-after-roe-v-wade-overturn">https://uk.pcmag.com/mobile-apps/142640/period-tracking-app-flo-adds-anonymous-mode-after-roe-v-wade-overturn</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0631		9/20/2022	Burky, A. (2022, September 20). "Post-Dobbs data privacy law in flux as experts, providers and tech companies rethink how to protect patient information." Fierce Healthcare. <a href="https://www.fiercehealthcare.com/health-tech/post-dobbs-data-privacy-law-flux-experts-debate-geolocation-data-message-encryption">https://www.fiercehealthcare.com/health-tech/post-dobbs-data-privacy-law-flux-experts-debate-geolocation-data-message-encryption</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0632		9/15/2022	Sorina, M. (2022, September 15). "We care deeply about our users' privacy, says tracking app Flo, amid data security concerns post Roe v Wade." Fem Tech World. <a href="https://www.femtechworld.co.uk/qa/we-care-deeply-about-our-users-privacy-says-tracking-app-flo-amid-data-privacy-concerns-post-roe-v-wade/">https://www.femtechworld.co.uk/qa/we-care-deeply-about-our-users-privacy-says-tracking-app-flo-amid-data-privacy-concerns-post-roe-v-wade/</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0633		4/11/2025	App Store Story. (2025, April 11). "Meet the women's health privacy pro." <a href="https://apps.apple.com/lt/story/id1694910212">https://apps.apple.com/lt/story/id1694910212</a>				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov; S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0634		12/20/2023	Leigh, D. (2023, December 20). "Expert Predictions For FemTech in 2024." Techround. <a href="https://techround.co.uk/news/expert-predictions-for-femtech-in-2024/">https://techround.co.uk/news/expert-predictions-for-femtech-in-2024/</a>				D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0635		2/11/2023	Authority Magazine Editorial Staff. (2023, February 11). "Data Privacy: Sue Khan of Flo Health On 5 Things You Need To Know To Optimize Your Company's Approach to Data Privacy." Medium. <a href="https://medium.com/authority-magazine/data-privacy-sue-khan-of-flo-health-on-5-things-you-need-to-know-to-optimize-your-companys-755ab35f49ca">https://medium.com/authority-magazine/data-privacy-sue-khan-of-flo-health-on-5-things-you-need-to-know-to-optimize-your-companys-755ab35f49ca</a>				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0636		2/16/2024	Khan, S. (2024, February 16). "Here's Why Trust in Female Health Technology is Critical." Information Week. <a href="https://www.informationweek.com/data-management/hcre-s-why-trust-in-female-health-technology-is-critical">https://www.informationweek.com/data-management/hcre-s-why-trust-in-female-health-technology-is-critical</a>				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0637		2/2/2024	King, C. (2024, February 2). "Flo Sets New Standards for Data Protection in Health Tech." Healthcare Digital. <a href="https://healthcare-digital.com/articles/flo-sets-new-standards-for-data-protection-in-health-tech">https://healthcare-digital.com/articles/flo-sets-new-standards-for-data-protection-in-health-tech</a>				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0638		5/28/2024	Falco, L. (2024, May 28). "Ensuring Data Protection In A Post-Roe World." Forbes. <a href="https://www.forbes.com/sites/lisa-falco/2024/05/28/ensuring-data-protection-in-a-post-roe-world/">https://www.forbes.com/sites/lisa-falco/2024/05/28/ensuring-data-protection-in-a-post-roe-world/</a>				S. Schumacher; M. Scrobov; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0639		7/26/2023	Med Tech Pulse. (2023, July 26). "Anonymous Mode: Femtech is Leading the Digital Health Industry in Privacy." <a href="https://www.medtechpulse.com/article/insight/anonymous-mode-femtech-is-leading-the-digital-health">https://www.medtechpulse.com/article/insight/anonymous-mode-femtech-is-leading-the-digital-health</a>				S. Schumacher; M. Scrobov; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0640			Document titled, "Privacy Team Bios."				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Authenticity	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0641		3/28/2023	Bryant, J. (2023, March 28). "Flo's Khan: Building a better future for female health is a 'privilege'." IAPP. <a href="https://iapp.org/news/a/flos-khan-building-a-better-future-for-female-health-is-a-privilege/">https://iapp.org/news/a/flos-khan-building-a-better-future-for-female-health-is-a-privilege/</a>				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0642		9/21/2023	Minsky, C. (2023, September 21). "Consumer groups put more value on security." The Financial Times. <a href="https://www.ft.com/content/93f23c86-7103-4b3e-88a6-af61280588e8">https://www.ft.com/content/93f23c86-7103-4b3e-88a6-af61280588e8</a>				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0643	FLO-00001104		Document titled, "Data Processing Admendment to G Suite and/or Complementary Product Agreement (Version 2.1)."				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias	Not relevant to any claim or defense		-	
0644	FLO-00001120		Document titled, "G Suite (Online) Agreement."				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias	Not relevant to any claim or defense		-	
0645	FLO-00001387	6/20/2019	Fabric Data Processing and Security Terms, dated June 20, 2019.				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias	Not relevant to any claim or defense		-	
0646	FLO-00001408	1/27/2017	Fabric Software and Services Agreement, dated January 27, 2017.				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias			-	
0647	FLO-00001422		Facebook webpage titled, "Data Processing Terms."				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias			-	
0648	FLO-00001423		Facebook webpage titled, "Terms of Service."				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias			-	
0649	FLO-00001462		Document titled, "Data Processing Amendment to the Google Analytics Agreement."				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias			-	
0650	FLO-00001469		Document titled, "Google Analytics Terms of Service."				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias			-	
0651	FLO-00001483	6/20/2019	Webpage titled, "Firebase Data Processing and Security Terms," dated June 20, 2019.				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias			-	
0652	FLO-00001506	7/31/2019	Document titled, "Firebase Paid Services Terms of Service."				For cross examination and/or to provide relevant context during expert examinations	Named Plaintiff's; Plaintiff's' Experts; C. Karkanias			-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0653	FLO-00001533		Document titled, "Data Processing Addendum," from the AppsFlyer Terms of Use.					For cross examination and/or to provide relevant context during expert examinations Named Plaintiffs; Plaintiffs' Experts; C. Karkanias			-	
0654	FLO-00001549	5/25/2018	Facebook webpage titled, "Custom Audiences Terms."					For cross examination and/or to provide relevant context during expert examinations Named Plaintiffs; Plaintiffs' Experts; C. Karkanias			-	
0655	FLO-00001550		Facebook webpage titled, "Data Processing Terms."					For cross examination and/or to provide relevant context during expert examinations Named Plaintiffs; Plaintiffs' Experts; C. Karkanias			-	
0656	FLO-00001551		Facebook webpage titled, "Terms of Service."					For cross examination and/or to provide relevant context during expert examinations Named Plaintiffs; Plaintiffs' Experts; C. Karkanias			-	
0657	FLO-00001572	10/12/2017	Google webpage titled, "Google Ads Data Processing Terms."					For cross examination and/or to provide relevant context during expert examinations Named Plaintiffs; Plaintiffs' Experts; C. Karkanias			-	
0658	FLO-00001597	11/1/2016	Google webpage titled, "Google Ads Terms & Conditions."					For cross examination and/or to provide relevant context during expert examinations Named Plaintiffs; Plaintiffs' Experts; C. Karkanias			-	
0659	FLO-00002362	6/22/2018	Flo Terms of Use dated June 22, 2018.								-	
0660			Flo Health - Let's Talk About It Campaign								-	
0661	FLO-00002823	3/27/2019	Flo's privacy policy, dated March 27, 2019.								-	
0662		0/0/2019	Screenshot of Dmitry Gurski LinkedIn Post regarding Flo's Christmas party - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0663		12/0/2024	Screenshot of Dmitry Gurski LinkedIn Post regarding PICCASO Awards Europe - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0664		12/0/2024	Screenshot of Dmitry Gurski LinkedIn Post regarding Flo team reaching 500 employees - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0665		0/0/2022	Screenshot of Dmitry Gurski LinkedIn Post regarding Flotilla for Peace and Freedom for people of Ukraine - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0666		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding Flo Presentation to Mike Pompeo - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0667		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding United Nations Population Fund - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0668		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding Presenting for United Nations Population Fund - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0669		0/0/2020	Dmitry Gurski LinkedIn photo with Dmitry Gurski and Natalia Kanem of the UNFPA - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0670		0/0/2020	Dmitry Gurski LinkedIn photo with Dmitry Gurski and Natalia Kanem holding shirt - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0671		0/0/2020	Dmitry Gurski LinkedIn photo with Dmitry Gurski and Natalia Kanem walking - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0672		0/0/2020	Dmitry Gurski LinkedIn photo with Dmitry Gurski and Natalia Kanem in hallway Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0673		0/0/2020	Dmitry Gurski LinkedIn photo of Natalia Kanem - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0674		0/0/2020	Dmitry Gurski LinkedIn photo of Natalia Kanem in hallway - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0675		0/0/2020	Dmitry Gurski LinkedIn photo of Presenting for United Nations Population Fund - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0676		0/0/2020	Dmitry Gurski LinkedIn photo of Natalia Kanem shaking hands - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0677		0/0/2020	Dmitry Gurski LinkedIn photo of Dmitry Gurski and Natalia Kanem talking - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0678		0/0/2020	Dmitry Gurski LinkedIn photo of Dmitry Gurski and Natalia Kanem in front of screen - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0679			Photo of Dmitry Gurski holding photo books				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0680		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding opening STEM center in Belarus - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0681	FLO-00003350		F.A.Q. - How to Sync Flo with Fitness Trackers and Health Apps.pdf				A. Klepchukova	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0682	FLO-00003353		App FAQs.jpeg				A. Klepchukova	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0683	FLO-00003354		F.A.Q. - Account, Data Restore and Sharing.pdf				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0684	FLO-00003357		Org Chart 01.01.22.pdf								-	
0685	FLO-00003358		Org Chart 30.09.2021.pdf								-	
0686	FLO-00003363		F.A.Q. - Technical Issues _ Reminders, Battery Usage, Notifications.pdf				R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0687	FLO-00003367		Current Org Chart.png				D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0688	FLO-00003425		Facebook - Lookalike terms.pdf				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0689	FLO-00003452		Data Processing Amendment to G Suite.pdf				R. Bugaev; M. Scrobov; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0690	FLO-00003492		Facebook Data Processing Terms .pdf				R. Bugaev; M. Scrobov; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0691	FLO-00003677		Google Ads Terms _ Conditions - Advertising Policies Help.docx				R. Bugaev; M. Scrobov; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0692	FLO-00003704		Google Ads Terms _ Conditions - Advertising Policies Help.pdf				R. Bugaev; M. Scrobov; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0693	FLO-00003721		Facebook general terms of service.pdf				R. Bugaev; M. Scrobov; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0694	FLO-00003788		G Suite Terms of Service – G Suite.pdf				R. Bugaev; M. Scrobov; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0695	FLO-00004108		Google Ads Data Processing Terms.pdf				R. Bugaev; M. Scrobov; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0696	FLO-00067081		android_1.jpg				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0697	FLO-00067082		android_2.jpg				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0698	FLO-00067083		iOS_1.PNG				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	



EXHIBIT A  
Joint Preliminary Trial Exhibit List  
Frasco v. Flo Health, Inc., et al, (Case No. 3:21-cv-00757-JD)

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0699	FLO-00067084		iOS_2.PNG				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0700	FLO-00067872		Flo.pdf				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0701	FLO-00068491		Screenshot_2019-06-28-17-35-36-553_org.iggymedia.periodtracker.png				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0702	FLO-00068492		Screenshot_2019-06-28-17-36-37-192_com.google.android.gms.png				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0703	FLO-00068493		Screenshot_2019-06-28-17-35-54-432_com.google.android.gms.png				R. Bugaev; M. Scrobov; L. Lydon; C. Karkanias	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0704	FLO-00071351		Flo.pdf				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0705	FLO-00071758		Brand Health, Usage & Attitude study January 2020 (1) (1).pdf				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0706	FLO-00071778		Flo_Stage Deck_all slides_Jan23 compressed.pdf				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0707	FLO-00072578		IMG_0259.PNG				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0708	FLO-00076578		Flo Brand Survey Results.pdf				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0709	FLO-00093873		Brand Internal Feburary 2021_Final (2) (1) (2).pdf				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0710	FLO-00093901		External Brand Perception Survey_May 2020_FINAL (1) (1).pdf				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0711	FLO-00095139		Flo_09_17.pdf				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0712	FLO-00098187		Copy of Flo Internal Research_User Attitude Pres.pptx				R. Bugaev; M. Scrobov; L. Lydon; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0713	FLO-00101945		Flo - statistics for Bayer.xlsx				R. Bugaev; M. Scrobov; L. Lydon	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0714	FLO-00104923		Transformation table Flo Helth 2020 25-5-2021.xlsx				R. Bugaev; M. Scrobov; L. Lydon	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0715	FLO-00105144	11/14/2018	Contract for Sponsorship of Contraceptive Education between Bayer AG and Flo Health, Inc. between Bayer AG and Flo Health, Inc., dated November 13, 2018.				T. Orlova; R. Bugaev; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.			-	
0716		0/0/2020	Dmitry Gurski LinkedIn photo regarding opening STEM center in Belarus - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0717		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding Belarus STEM center with group gathered around tech - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0718		0/0/2020	Dmitry Gurski LinkedIn Photo regarding Belarus STEM center with group gathered around tech - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0719		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding Belarus STEM center holding up cut ribbon - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0720		0/0/2020	Dmitry Gurski LinkedIn Photo regarding Belarus STEM center holding up cut ribbon - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0721		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding Belarus STEM center STEAM sign - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0722		0/0/2020	Dmitry Gurski LinkedIn Photo regarding Belarus STEM center STEAM sign - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0723		0/0/2020	Screenshot of Dmitry Gurski LinkedIn Post regarding Belarus STEM center STEAM room - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0724		0/0/2020	Dmitry Gurski LinkedIn Photo regarding Belarus STEM center STEAM room - Publicly Available				D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0725	n/a	5/2/2024 (accessed)	42matters, "Mobile SDKs Explorer from 42matters   updated May 2024," <a href="https://42matters.com/sdks">https://42matters.com/sdks</a> , accessed May 2, 2024	n/a			C. Karkanias; G. Zervas	Foundation for Expert Opinion ; Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	
0726		0/0/2006	Hinton, G. and Osindero, S. (2006). "A fast learning algorithm for deep belief nets." - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0727		0/0/2017	Lundberg, S. and Lee, S. (2017). "A Unified Approach to Interpreting Model Predictions." 31st Conference on Neural Information Processing Systems. - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0728		3/15/2023	Social media post by AppCensus dated March 15, 2023 - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0729		0/0/2017	Vaswani, A. et al. (2017). "Attention Is All You Need." 31st Conference on Neural Information Processing Systems. - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0730		12/23/2020	Document titled, "What Is an SDK?", dated December 23, 2020. - Publicly Available				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	
0731		8/21/2014	Sunyaev, A. et al. (2014, August 21). "Availability and quality of mobile health app privacy policies." J Am Med Inform Assoc. - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0732		5/24/2019	Devlin, J. et al. (2019, May 24). "BERT: Pre-training of Deep Bidirectional Transformers for Language Understanding." - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0733		1/0/1995	Lecun, Y. and Bengio, Y. (January 1995). "Convolutional Networks for Images, Speech, and Time-Series." - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0734		10/13/2014	Schmidhuber, J. (2014, October 13). "Deep learning in neural networks: An overview." Elsevier Ltd. - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0735		5/0/2015	LeCun, Y., Bengio, Y., and Hinton, G. (May 2015). "Deep Learning." Nature, 521(7553), 436-444. - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0736		2/2/2017	Esteva, A. et al. (2017, February 2). "Dermatologist-level classification of skin cancer with deep neural networks." Nature, 542 (7639): 115-118. doi:10.1038/nature21056. - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0737			Webpage titled, "StoreKit 2." - Publicly Available				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0738		6/0/2020	Raffel, C. et al. (June 2020). "Exploring the Limits of Transfer Learning with a Unified Text-to-Text Transformer." Journal of Machine Learning Research 21 (2020). - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0739			Webpage from support.google.com titled, "Ads."				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	
0740			Radford, A. et al. "Improving Language Understanding by Generative Pre- Training." - - Publicly Available				C. Karkanias	Foundation for Expert Opinion			-	
0741		7/22/2020	Brown, T. et al. (2020, July 22). "Language Models are Few-Shot Learners." - Publicly Available				C. Karkanias	Foundation for Expert Opinion	-		-	
0742		7/17/2015	Jordan, M.I., and Mitchell, T.M. (2015, July 17). "Machine learning: Trends, perspectives, and prospects." Science Mag, 349 (6245), 255-260.				C. Karkanias	Foundation for Expert Opinion	-		-	
0743			Webpage from developers.facebook.com titled, "Advertiser Tracking Enabled."				C. Karkanias	Foundation for Expert Opinion	Authenticity		-	
0744			Webpage from developers.facebook.com titled, "FAQ."				C. Karkanias	Foundation for Expert Opinion	Authenticity		-	
0745		4/12/2021	Piktus, A. et al. (2021, April 12). "Retrieval-Augmented Generation for Knowledge-Intensive NLP Tasks."				C. Karkanias	Foundation for Expert Opinion	-		-	
0746	n/a	1/26/2023	Koetsier, John, "5 billion ad events show that fewer than 1% of Android users opt out of personalized ads," Singular, <a href="https://www.singular.net/blog/adpersonalization-android/">https://www.singular.net/blog/adpersonalization-android/</a> , accessed May 23, 2024	n/a			C. Karkanias; G. Zervas	Foundation for Expert Opinion; Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0747		4/0/2018	Bzdok, D., Altman, N. and Krzywinski, M. (April 2018). "Statistics versus machine learning." Nat Methods. 2018 April ; 15(4): 233–234. doi:10.1038/nmeth.4642.				C. Karkanias	Foundation for Expert Opinion	-		-	
0748		9/22/2019	Rudin, C. (2019, September 22). "Stop Explaining Black Box Machine Learning Models for High Stakes Decisions and Use Interpretable Models Instead."				C. Karkanias	Foundation for Expert Opinion	-		-	
0749			Graves, A. "Supervised Sequence Labelling with ecurrent Neural Networks."				C. Karkanias	Foundation for Expert Opinion	-		-	
0750		5/23/2018	Howard, J., and Ruder, S. (2018, May 23). "Universal Language Model Fine- tuning for Text Classification."				C. Karkanias	Foundation for Expert Opinion	-		-	
0751			Webpage on appcensus.io titled, "Unlock unparalleled insight into your mobile app privacy."				C. Karkanias	Foundation for Expert Opinion			-	
0752			Webpage on charles.proxy.com titled, "Web Debugging Prox Application for Windows, Mac OS and Linux."				C. Karkanias	Foundation for Expert Opinion			-	
0753			Webpage on web.archive.org titled, "Custom Events with Flurry Analytics for iOS."				C. Karkanias	Foundation for Expert Opinion			-	
0754			Webpage on web.archive.org titled, "Custom Events with Flurry Analytics for iOS."				C. Karkanias	Foundation for Expert Opinion			-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0755		2/9/2021	Moshlegh, L., et al. (2021, February 9). "Flurry 2021 State of Mobile."				C. Karkanias	Foundation for Expert Opinion			-	
0756		6/28/2024	Expert Rebuttal Report by Chris D. Karkanias, dated June 28, 2024.				C. Karkanias	Foundation for Expert Opinion			-	
0757		5/3/2024	Expert Report by Chris D. Karkanias, dated May 3, 2024.				C. Karkanias	Foundation for Expert Opinion			-	
0758			Webpage on mitmproxy.org titled, "mitmproxy is a free and open source interactive HTTPS proxy."				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	
0759			Webpage on sideloadly.io titled, "Sideloadly: The Ultimate iOS Sideload Tool."				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	
0760			Flo Health Cooperation Agreement with EBCOG - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Authenticity	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0761			Flo Health Articles Sponsored by EBCOG - Publicly Available				A. Klepchukova; D. Gorski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Authenticity	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0762	n/a	2016	Goodfellow, Ian, Yoshua Bengio, and Aaron Courville, Deep Learning, MIT Press, <a href="https://www.deeplearningbook.org/">https://www.deeplearningbook.org/</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	Authenticity		-	
0763		0/0/2018	Sejnowski, T. J. (2018). The deep learning revolution. MIT press. <a href="https://mitpress.mit.edu/books/deep-learning-revolution">https://mitpress.mit.edu/books/deep-learning-revolution</a>				C. Karkanias	Foundation for Expert Opinion			-	
0764	FLURRY_FRASCO_000011		Document titled, "Events for Flurry Analytics."				R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0765	FLURRY_FRASCO_000030		Document titled, "Event Parameter Distribution."				R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0766	FLURRY_FRASCO_000163		Document from Yahoo Developer Network titled, "Features."				R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0767	FLURRY_FRASCO_000176		Document from Yahoo Developer Network titled, "Breakouts."				R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0768	FLURRY_FRASCO_000179		Document from Yahoo Developer Network titled, "Custom Dashboards."				R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0769	FLURRY_FRASCO_001010		Document from dev.flurry.com titled, "Company Activity Dashboard."				R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0770	META-FRASCO-0000002258	Varied	Meta, Flo Analytics Dashboard Aug. 12, 2019 - Aug 11, 2021	HC-AEO			T. Wooldridge; A. Lapitski; Flo Witness	Relevant to Absence of Eavesdropping	-		-	
0771			Terms of Service with OwHealth, Inc., for use of the Flo mobile application.				S. Schumacher; M. Scrobov; C. Karkanias	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity	Will provide bates-stamped image during exchange process	-	
0772			Screenshot of Terms of Service with OwHealth, Inc., for use of the Flo mobile application.				S. Schumacher; M. Scrobov; C. Karkanias	To establish Flo's affirmative defense and rebut all of Plaintiff's claims			-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0773	FLO-00105158	11/2/2018	Document titled, "Agreement for the Cooperation for a Disease Awareness Project in Brazil including use of a Virtual Assistant," between Bayer AG and Flo Health, Inc., dated November 2, 2018.				T. Orlova	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Not relevant to any claim or defense	Relevant to the extent Flo loses its MIL re P&G and Bayer	-	
0774	FLO-00105127	7/24/2018	Document titled, "Advertising Services Agreement," between OwHealth, Inc. and Procter & Gamble, dated July 24, 2018.				T. Orlova; R. Bugaev; M. Scrobov	To establish Flo's affirmative defense and rebut all of Plaintiff's claims			-	
0775		2/16/2018	UNFPA. (2018, February 16). UNFPA partners with Flo app to bring reproductive health information to millions of users. <a href="https://www.unfpa.org/updates/unfpa-partners-flo-app-bring-reproductive-health-information-millions-users">https://www.unfpa.org/updates/unfpa-partners-flo-app-bring-reproductive-health-information-millions-users</a>				A. Klepchukova; D. Gurski	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0776		5/5/2025	Max Scrobov's LinkedIn profile page.				M. Scrobov	As relevant background for Mr. Scrobov's examination	Not relevant to any claim or defense	Relevant to establishing background and credential of M. Scrabo	-	
0777		2/17/2023	Grande, A. (2023, February 17). Cybersecurity & Privacy Group of the Year: Dechert. Law360.				M. Scrobov	As relevant background for Mr. Scrobov's examination	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0778		3/16/2022	Flo. (2022, March 16). Flo Health Inc. company update, March 2022. <a href="https://flo.health/newsroom/flo-company-update">https://flo.health/newsroom/flo-company-update</a>				D. Gurski; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0779		6/30/2022	Flo. (2022, June 30). Flo, the leading female health app, launches 'Anonymous Mode' to further protect reproductive health information in wake of Roe v. Wade decision. <a href="https://flo.health/newsroom/flo-launches-anonymous-mode">https://flo.health/newsroom/flo-launches-anonymous-mode</a>				D. Gurski; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0780		3/8/2022	Flo. (2022, March 8). Supporting our Flo community in Ukraine. <a href="https://flo.health/newsroom/flo-ukraine-support">https://flo.health/newsroom/flo-ukraine-support</a>				D. Gurski; A. Klepchukova; T. Orlova; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0781			Flo webpage titled, "UNFPA."				D. Gurski; A. Klepchukova; T. Orlova; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Authenticity	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0782		3/16/2022	Flo. (2022, March 16). Flo Health Inc. company update, March 2022. <a href="https://flo.health/newsroom/flo-company-update">https://flo.health/newsroom/flo-company-update</a>				D. Gurski; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0783			Defendant Google LLC's Fourth Supplemental Responses to Plaintiffs' Interrogatories, Set One.				L. Hitt; C. Karkanas; Google Fact Witnesses	Foundation for L. Hitt and C. Karkanas opinions; relevant for cross-examination			-	
0784		9/7/2017	Zavyalova, V. (2017, September 7). New Russian tech app credited with 100,000 pregnancies a month. Russia Beyond. <a href="https://www.rbth.com/science-and-tech/326110-new-russian-tech-app-pregnancies">https://www.rbth.com/science-and-tech/326110-new-russian-tech-app-pregnancies</a>				L. Hitt	Foundation for L. Hitt's opinion	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0785		3/8/2022	Flo. (2022, March 8). Supporting our Flo community in Ukraine. <a href="https://flo.health/newsroom/flo-ukraine-support">https://flo.health/newsroom/flo-ukraine-support</a>				L. Hitt	Foundation for L. Hitt's opinion	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	
0786			Vildan Altuglu, Lorin M. Hitt, S. Hussain, and M. Li Bergolis, "Valuation of Privacy: Assessing Potential Harm from Unauthorized Access and Misuse of Private Information in Consumer Class Actions," in Legal Applications of Marketing Theory, eds. Professors Jacob Gersen and Joel Steckel.				L. Hitt	Foundation for L. Hitt's opinion			-	
0787			Bevafa, H., Hitt, L., and Terwiesch, C. (2018, December.)"The Impact of E-Visits on Visit Frequencies and Patient Health: Evidence from Primary Care." Manage Sci. 64(12): 5461–5480. doi:10.1287/mnsc.2017.2900.				L. Hitt	Foundation for L. Hitt's opinion			-	
0788			"Poaching and the Misappropriation of Information: Transaction Risks of Information Exchange."				L. Hitt	Foundation for L. Hitt's opinion			-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0789			N. Gregory Mankiw, Principles of Economics, Eighth Edition (Boston, MA: Cengage Learning, 2018), p. 66 (“A market is a group of buyers and sellers of a particular good or service. The buyers as a group determine the demand for the product, and the sellers as a group determine the supply of the product.”).				L. Hitt	Foundation for L. Hitt's opinion			-	
0790			Epsilon, <a href="https://www.epsilon.com/us/products-and-services/data">https://www.epsilon.com/us/products-and-services/data</a> .				L. Hitt	Foundation for L. Hitt's opinion			-	
0791			“Get in touch with mailing list customers,” Exact Data, <a href="https://www.exactdata.com/consumer-mailing-lists.html">https://www.exactdata.com/consumer-mailing-lists.html</a>				L. Hitt	Foundation for L. Hitt's opinion			-	
0792			B2C (Business to Consumer) Master File Email/Postal/Phone,” Exact Data, <a href="https://www.exactdata.com/downloaddocs/Exact-Data-B2C-Master-File-Rate-Card.pdf">https://www.exactdata.com/downloaddocs/Exact-Data-B2C-Master-File-Rate-Card.pdf</a>				L. Hitt	Foundation for L. Hitt's opinion			-	
0793			Alice Scott, “Consumer Mailing Lists,” leadsplease, April 3, 2024, <a href="https://www.leadsplease.com/mailinglists/consumer">https://www.leadsplease.com/mailinglists/consumer</a>				L. Hitt	Foundation for L. Hitt's opinion			-	
0794		7/1/2024	Alice Scott, “Buy Email Lists & Email Address Lists,” leadsplease, July 1, 2024, <a href="https://www.leadsplease.com/email-lists/consumer#id_2">https://www.leadsplease.com/email-lists/consumer#id_2</a>				L. Hitt	Foundation for L. Hitt's opinion			-	
0795			“Targeted Marketing Lists,” Exact Data, <a href="https://www.exactdata.com/quote/form.php">https://www.exactdata.com/quote/form.php</a>				L. Hitt	Foundation for L. Hitt's opinion			-	
0796			“Data Quality,” leadsplease, <a href="https://www.leadsplease.com/data-quality">https://www.leadsplease.com/data-quality</a>				L. Hitt	Foundation for L. Hitt's opinion			-	
0797			Photos of R. Bugaev				R. Bugaev	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0798			Photos of D. Gurski				D. Gurski	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0799			Photos of A. Klepchukova				A. Klepchukova	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0800			Chart of 12 CAEs				R. Bugaev; L. Lydon	To provide relevant background during direct examination				
0801	FLO-00073498		FLO-00073498				T. Orlova	To establish Flo's affirmative defense and rebut all of Plaintiff's claims and request for damages	Not relevant to any claim or defense	Relevant to rebutting Plaintiffs' claims for punitive damages		
0802			Photos of M. Scrobov				M. Scrobov	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0803			Photos of T. Orlova				T. Orlova	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0804			Photos of L. Lydon				L. Lydon	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0805			Photos of S. Schumacher				S. Schumacher	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0806			Video of Flo App Transmitting App Event Data Using Produced APKs and Binaries				C. Karkanias; R. Bugaev; L. Lydon	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity	Relevant to providing context on the Flo app and showing its operation; available features of the app; the transmission of CAEs, which will be helpful to rebutting Plaintiffs' claims at trial		
0807			Flo Health Consent Screens				S. Schumacher; M. Scrobov; C. Karkanias	To establish Flo's affirmative defense and rebut all of Plaintiff's claims				
0808			Glow Privacy Policies // Terms of Service				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		
0809			Stardust Privacy Policies // Terms of Service				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		
0810			Fertility Friend FF Privacy Policies // Terms of Service				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0811			Ovia Privacy Policies // Terms of Service				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		
0812			Natural Cycles Privacy Policies // Terms of Service				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		
0813			Demonstrative vdeo of the Flo App				S. Schumacher; A. Klepchukova; C. Karkanias; L. Lydon	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to providing context on the Flo app and showing its operation; available features of the app; and the like		
0814			Clue Privacy Policies // Terms of Service				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		
0815			Flo Annual Revenues / Financials				T. Orlova	To establish Flo's affirmative defense and rebut all of Plaintiff's claims and request for damages	Authenticity; relevance	Relevant to rebutting Plaintiffs' claims for punitive damages		
0816			Photos of C. Karkanias				C. Karkanias	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to establishing background and qualifications of expert witness		
0817	FLO-00070876		Email re: Apple's restriction of using 3rd party tools by health apps				D. Gurski; R. Bugaev	To establish Flo's affirmative defense and rebut all of Plaintiff's claims				
0818			Article compilation regarding data sharing and Facebook				Cross Examination of Named Plaintiffs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to Flo's affirmative defense on statute of limitations; will be authenticated at trial		
0819			Article compilation regarding data sharing and Flo Health				Cross Examination of Named Plaintiffs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to Flo's affirmative defense on statute of limitations; will be authenticated at trial		
0820			Sarah Wellman 1/11/2023 Deposition Exhibit 47 - Email				S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs				
0821			Photos of Flo Offices				D. Gurski; A. Klepchukova; T. Orlova; R. Bugaev; S. Schumacher; M. Scrobov	To provide relevant background during direct examination	Authenticity; relevance	Relevant to establishing background/context about Flo and its employees as well as rebutting punitive damages		
0822			Screenshot of FTC customer notice, regarding Flo Period & Ovulation Tracker app identifying numbers.				M. Scrobov	To rebut Plaintiff's claims should the Court deny MIL No. 4	-			
0823	FLO-00003063	5/25/2018	Facebook Business Tools Terms, effective May 25, 2018	Confidential			Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; J. Onuchina	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0824	FLO-00025695	2/22/2019	Email from Julia to Support@owhealth re Period Tracker Flo, Pregnancy & Ovulation Calendar -account deletion request	Confidential			Flo Witness	Relevant to Superseding or Intervening Cause	-		-	
0825	FLO-00025710	2/24/2019	Email to Support@owhealth re Delete account and all data	Confidential			Flo Witness	Relevant to Superseding or Intervening Cause	-		-	
0826	FLO-00025907	2/26/2019	Email from Linda to support@owhealth.com re Flo 4.23.0	Confidential			Flo Witness	Relevant to Superseding or Intervening Cause	-		-	
0827	FLO-00025920	4/20/2019	Email from Minjee to support@owhealth.com re Flo 4.29.1	Confidential			Flo Witness	Relevant to Superseding or Intervening Cause	-		-	
0828	FLO-00025926	5/1/2019	Email from Tracy to support@owhealth.com re Flo 4.30.0	Confidential			Flo Witness	Relevant to Superseding or Intervening Cause	-		-	

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0829	FLO-00104800	n/a	Flo Welcome Screen	Confidential			Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense	-		-	
0830	Flohealth_Egelman_00000796	n/a	APK files from Egelman report	Confidential			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0831	Flohealth_Egelman_00002666	n/a	Logs from Egelman report: Flohealth_Egelman_00002666	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0832	Flohealth_Egelman_00002667	n/a	Logs from Egelman report: Flohealth_Egelman_00002667	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0833	Flohealth_Egelman_00002668	n/a	Logs from Egelman report: Flohealth_Egelman_00002668	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0834	Flohealth_Egelman_00002669	n/a	Logs from Egelman report: Flohealth_Egelman_00002669	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0835	Flohealth_Egelman_00002670	n/a	Logs from Egelman report: Flohealth_Egelman_00002670	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0836	Flohealth_Egelman_00002671	n/a	Logs from Egelman report: Flohealth_Egelman_00002671	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0837	Flohealth_Egelman_00002672	n/a	Logs from Egelman report: Flohealth_Egelman_00002672	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0838	Flohealth_Egelman_00002673	n/a	Logs from Egelman report: Flohealth_Egelman_00002673	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0839	Flohealth_Egelman_00002674	n/a	Logs from Egelman report: Flohealth_Egelman_00002674	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0840	Flohealth_Egelman_00002675	n/a	Logs from Egelman report: Flohealth_Egelman_00002675	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0841	Flohealth_Egelman_00002676	n/a	Logs from Egelman report: Flohealth_Egelman_00002676	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0842	Flohealth_Egelman_00002677	n/a	Logs from Egelman report: Flohealth_Egelman_00002677	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0843	Flohealth_Egelman_00002678	n/a	Logs from Egelman report: Flohealth_Egelman_00002678	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0844	Flohealth_Egelman_00002679	n/a	Logs from Egelman report: Flohealth_Egelman_00002679	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0845	Flohealth_Egelman_00002680	n/a	Logs from Egelman report: Flohealth_Egelman_00002680	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0846	Flohealth_Egelman_00002681	n/a	Logs from Egelman report: Flohealth_Egelman_00002681	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0847	Flohealth_Egelman_00002682	n/a	Logs from Egelman report: Flohealth_Egelman_00002682	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0848	Flohealth_Egelman_00002683	n/a	Logs from Egelman report: Flohealth_Egelman_00002683	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0849	Flohealth_Egelman_00002684	n/a	Logs from Egelman report: Flohealth_Egelman_00002684	HC-AEO			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0850	Flohealth_Golbeck_00004720	2018-06 (2023-07-11)	Golbeck, Jennifer, "Predicting Alcoholism Recovery from Twitter"	Confidential			J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0851	JOINT-FRASCO-Zervas-00000006	4/19/2023 (accessed)	Meta Business Help Center, "About app events"	n/a			A. Lapitski; T. Wooldridge	Relevant to Absence of Eavesdropping	-		-	

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0852	JOINT-FRASCO-Zervas-00000090	4/15/2024 (accessed)	Android, "Run apps on the Android Emulator - Android Developers," <a href="https://developer.android.com/studio/run/emulator">https://developer.android.com/studio/run/emulator</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0853	JOINT-FRASCO-Zervas-00000532	10/31/2023	Flo Privacy Policy, <a href="https://flo.health/privacy-policy">https://flo.health/privacy-policy</a> , accessed March 29, 2024	n/a			Plaintiffs; Flo Witness; G. Zervas	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0854	JOINT-FRASCO-Zervas-00000991	3/2/2017	Meta, "AppEventsLogger," Wayback Machine, as of March 2, 2017, <a href="https://web.archive.org/web/20170302173441/https://developers.facebook.com/docs/reference/android/current/class/AppEventsLogger/">https://web.archive.org/web/20170302173441/https://developers.facebook.com/docs/reference/android/current/class/AppEventsLogger/</a>	n/a			G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping	-		-	
0855	META-FRASCO-0000000156	n/a	Meta, "App Events" Overview	n/a			T. Wooldridge; A. Lapitski; Flo Witness	Relevant to Absence of Eavesdropping	-		-	
0856	META-FRASCO-0000000165	n/a	Meta, "App Events"	n/a			T. Wooldridge; A. Lapitski; Flo Witness	Relevant to Absence of Eavesdropping	-		-	
0857	META-FRASCO-0000000224	n/a	Meta, "Getting Started with the Facebook Business SDK"	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0858	META-FRASCO-0000000260	n/a	Meta, "Getting Started with App Events for Android"	n/a			A. Lapitski; G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0859	META-FRASCO-0000000402	n/a	Meta, "Getting Started with App Events for iOS"	n/a			A. Lapitski; T. Wooldridge; B. Arroyo; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0860	META-FRASCO-0000000412	n/a	Meta, "Getting Started with App Events for iOS"	n/a			A. Lapitski; G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0861	META-FRASCO-0000001217	Varied	Mobile App Custom Audiences Created by Flo from June 2016 to June 2021	n/a			K. Shah; A. Lapitski; Flo Witness	Relevant to Absence of Eavesdropping	-		-	
0862	META-FRASCO-0000002558	10/1/2019	Meta, "Business Tools Data Policies Article"	n/a			S. Satterfield; G. Zervas; O. Bagdasarov; F. Leach	Relevant to Absence of Eavesdropping	incorrect bates number?	This should just be META-FRASCO-0000002558, we should correct!	-	
0863	META-FRASCO-0000002594	10/22/2020	Facebook Terms of Service, date of last revision October 22, 2020	n/a			Plaintiffs; T. Wooldridge; A. Dahiya; G. Nebol-Perlman; B. Arroyo	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0864	META-FRASCO-0000002679	8/31/2020	Facebook Commercial Terms, effective date August 31, 2020	n/a			Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; J. Onuchina	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0865	META-FRASCO-0000002947 through META-FRASCO-0000002949	12/26/2019	Facebook Business Tools Terms, effective December 26, 2019	n/a			Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; J. Onuchina	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0866	META-FRASCO-0000002981	n/a	Meta, "Facebook App Events"	n/a			A. Lapitski; G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0867	META-FRASCO-0000003207	n/a	Meta, "People-based Measurement by Facebook"	n/a			T. Wooldridge; J. Zheng; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0868	META-FRASCO-0000019631	n/a	Meta, Advertising Revenue based on Flo App Events	HC-AEO			K. Shah; A. Lapitski	Relevant to Damages	-		-	
0869	META-FRASCO-0000019688	2/22/2019	Email between N. Anklesaria and karissa@mashable.com	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0870	META-FRASCO-0000019742	2/22/2019	Email from Glenn.CHAPMAN@afp.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0871	META-FRASCO-0000019807	2/22/2019	Email from JGarsd@npr.org to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0872	META-FRASCO-0000019810	2/22/2019	Email from hneidig@thehill.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	

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0873	META-FRASCO-0000019875	2/22/2019	Email from twolverton@businessinsider.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0874	META-FRASCO-0000019943	2/22/2019	Email between N. Anklesaria and laurence.dodds@telegraph.co.uk	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0875	META-FRASCO-0000019959	2/22/2019	Email from mike.lasusa@law360.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0876	META-FRASCO-0000019995	2/22/2019	Email between N. Anklesaria and queenic.wong@cbsinteractive.com	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0877	META-FRASCO-0000020049	2/22/2019	Email from Amanda.L.delCastillo@abc.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0878	META-FRASCO-0000020050	2/22/2019	Email from MAnderson@ap.org to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0879	META-FRASCO-0000020052	2/22/2019	Email from Lauren.Feiner@nbcuni.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0880	META-FRASCO-0000020055	2/22/2019	Email from michael_kan@ziffdavis.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0881	META-FRASCO-0000020060	2/22/2019	Email between N. Anklesaria and dave.lee@bbc.co.uk	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0882	META-FRASCO-0000023838	n/a	Media Inquiry Playbook	HC-AEO				Relevant Background	-		-	
0883	META-FRASCO-0000028004	Oct. 2019	Meta, "Facebook Business Tools Security Guide"	Confidential			Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; O. Bagdasarov	Relevant to Absence of Eavesdropping	Duplicative of META-FRASCO-0000027855-0000027895	N/A	-	
0884	META-FRASCO-0000369433	n/a	Meta, Flo App Event Optimizations	HC-AEO			K. Shah; A. Lapitski	Relevant to Absence of Eavesdropping	-		-	
0885	META-FRASCO-0000369515	n/a	Meta, "About ad delivery," Business Help Center article for advertisers	n/a			T. Wooldridge; J. Zheng; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0886	META-FRASCO-0000407022	n/a	Custom and LAL. Audiences Created by Flo	HC-AEO			K. Shah; A. Lapitski	Relevant to Superseding or Intervening Cause, Relevant to Damages	-		-	
0887	META-FRASCO-0000407206	11/22/2022	Meta "3d Party Data Retention Policy"	HC-AEO			T. Wooldridge	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0888	META-FRASCO-0000407229	n/a	Meta, "Hive Anon"	HC-AEO			T. Wooldridge	Relevant Background	-		-	
0889	META-FRASCO-Zervas-000000007	8/20/2021	Patel, Ronak, "Things to consider while Integrating 3rd Party services in your Mobile App," AGLOWID, https://aglowidsolutions.com/blog/integrating-3rd-party-services-in-mobile-app	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Relevant to Superseding or Intervening Cause	-		-	
0890	META-FRASCO-Zervas-000000045	1/25/2020	Westenberg, Jimmy, "We asked, you told us: 65% of you throw caution to the wind and autoupdate apps," Android Authority, https://www.androidauthority.com/auto-update-apps-google-play-store-poll-results-1077403/	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Relevant to Superseding or Intervening Cause	-		-	
0891	META-FRASCO-Zervas-000000157	9/14/2022	Flo Privacy Policy (archived), https://flo.health/privacy-policyarchived/14-september-2022, accessed April 1, 2024	n/a			Plaintiffs; Flo Witness; G. Zervas	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0892		3/7/2023	2023-03-07 Jennifer Chen's Supplemental R&Os to Non Flo Defs ROGs (Confidential)	Confidential			J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	

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0893		3/7/2023	2023-03-07 Tesha Gamino's Supplemental R&Os to Non Flo Defs ROGs (Confidential)	Confidential			T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0894		3/7/2023	2023-03-07 Sarah Wellman's Supplemental ROG Responses to Non Flo Defs ROGs (Confidential)	Confidential			S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0895	n/a	4/10/2019	Harwell, Drew, "Is your pregnancy app sharing your intimate data with your boss?," Washington Post	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0896	n/a	1/25/2022	Capterra, "Improve Your First-Party Data Strategy - Our Search Shows You How"	n/a			Flo Witness	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0897	n/a	7/8/2015	Marketing Week, "Consumers are 'dirtying' databases with false details"	n/a			Flo Witness	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0898		7/11/2023	J. Golbeck Website Screenshot				J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0899		7/11/2023	Reddit thread titled "I'm a computer scientist studying creepy things we can do with your online data -AMA"				J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0900	n/a	8/12/2018	Flo Privacy Shield certification	n/a			Flo Witness	Relevant to Intervening or Superseding Cause	-		-	
0901	n/a	8/2/2023	List of invoices from S. Egeleman	n/a			S. Egelman	Relevant to Bias, Expert Cross-Examination	-		-	
0902	n/a	5/3/2024	Expert Report of G. Zervas, Ph.D.	HC AEO			G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0903	n/a	6/28/2024	Expert Rebuttal Report of G. Zervas, Ph.D.	HC AEO			G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0904	n/a	10/20/2022	Plaintiff Jennifer Chen's Amended Objections and Responses to Defendants' (Meta Platforms, Inc., Google LLC, and Flurry, LLC) First Set of Interrogatories	Confidential			J. Chen	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0905		9/15/2022	2022-09-15 Jennifer Chen's R&O to Flo Health's ROGs (Confidential)	Confidential			J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0906	n/a	9/15/2022	Plaintiff Sarah Wellman's Responses and Objections to Defendant Flo Health, Inc.'s Interrogatories	Confidential			S. Wellman	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0907	n/a	9/15/2022	Plaintiff Tesha Gamino's Responses and Objections to Defendant Flo Health, Inc.'s Interrogatories	Confidential			T. Gamino	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	
0908	n/a	Jul-19	Monella, L., "Beware of fertility apps — your data may be sold to companies, warns think tank," Euronews, available at https://www.euronews.com/2018/04/11/beware-of-fertility-apps-your-data-may-be-sold-to-companies-warns-think-tank	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0909	n/a	2022	Berman, Ron, and Ayelet Israeli, "The Value of Descriptive Analytics: Evidence from Online Retailers," Marketing Science, Vol. 41, No. 6, 2022, pp. 1074-1096	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

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0910	n/a	2023	Chung, Moonwon, Luv Sharma, and Manoj K. Malhotra, "Impact of Modularity Design on Mobile App Launch Success," Manufacturing & Service Operations Management, Vol. 25, No. 2, pp. 756-774	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0911	n/a	Jan. 2008	Haefliger, Stefan, Georg von Krogh, and Sebastian Spaeth, "Code Reuse in Open Source Software," Management Science, Vol. 54, No. 1, January 2008, pp. 180-193	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0912	n/a	8/25/2021	Abdul, Shan, "Google Play Store Isn't Auto-Updating Apps? Try These Fixes," MakeUseOf, <a href="https://www.makeuseof.com/google-play-store-not-auto-updating-apps/">https://www.makeuseof.com/google-play-store-not-auto-updating-apps/</a> , accessed May 5, 2023	n/a			G. Zervas				-	
0913	n/a	4/15/2024 (accessed)	Amazon Web Services, "What is an SDK? - SDK Explained," <a href="https://aws.amazon.com/whatis/sdk/">https://aws.amazon.com/whatis/sdk/</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0914	n/a	4/17/2023 (accessed)	Amazon Web Services, "What is Caching and How it Works," <a href="https://aws.amazon.com/caching/">https://aws.amazon.com/caching/</a> , accessed April 17, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0915	n/a	4/15/2024 (accessed)	Android, "The activity lifecycle - Android Developers," <a href="https://developer.android.com/guide/components/activities/activity-lifecycle">https://developer.android.com/guide/components/activities/activity-lifecycle</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0916	n/a	4/15/2024 (accessed)	Android, "Download Android Studio & App Tools - Android Developers," <a href="https://developer.android.com/studio">https://developer.android.com/studio</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0917	n/a	4/15/2024 (accessed)	Android, "Kotlin and Android - Android Developers," <a href="https://developer.android.com/kotlin">https://developer.android.com/kotlin</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0918	n/a	4/1/2024 (accessed)	App Guardians, "Mobile App Tools (SDKs) Simplified: How to Choose the Best For Your App," <a href="https://appguardians.com/blog/mobile-sdks-simplified-how-to-choose-the-best-for-yourapp/">https://appguardians.com/blog/mobile-sdks-simplified-how-to-choose-the-best-for-yourapp/</a> , accessed April 1, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0919	n/a	4/15/2024 (accessed)	Apple, "About Objective-C   Apple Developer," <a href="https://developer.apple.com/library/archive/documentation/Cocoa/Conceptual/ProgrammingWithObjectiveC/Introduction/Introduction.html">https://developer.apple.com/library/archive/documentation/Cocoa/Conceptual/ProgrammingWithObjectiveC/Introduction/Introduction.html</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0920	n/a	4/29/2024 (accessed)	Apple, "AdSupport Framework   Apple Developer Documentation," <a href="https://developer.apple.com/documentation/adsupport">https://developer.apple.com/documentation/adsupport</a> , accessed April 29, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

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0921	n/a	4/1/2024 (accessed)	Apple, "advertisingIdentifier   Apple Developer Documentation," <a href="https://developer.apple.com/documentation/adsupport/asidentifiermanager/advertisingidentifier">https://developer.apple.com/documentation/adsupport/asidentifiermanager/advertisingidentifier</a> , accessed April 1, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0922	n/a	4/15/2024 (accessed)	Apple, "Handling Common State Transitions   Apple Developer Documentation," <a href="https://developer.apple.com/documentation/watchkit/life_cycles/handling_common_state_transitions">https://developer.apple.com/documentation/watchkit/life_cycles/handling_common_state_transitions</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0923	n/a	9/16/2020	Apple, "iOS 14 is available today," <a href="https://www.apple.com/newsroom/2020/09/ios-14-is-available-today/">https://www.apple.com/newsroom/2020/09/ios-14-is-available-today/</a> , accessed April 22, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0924	n/a	4/16/2024 (accessed)	Apple, "Managing your app's life cycle   Apple Developer Documentation," <a href="https://developer.apple.com/documentation/uikit/app_and_environment/managing_your_app_s_life_cycle">https://developer.apple.com/documentation/uikit/app_and_environment/managing_your_app_s_life_cycle</a> , accessed April 16, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0925	n/a	4/15/2024 (accessed)	Apple, "Reducing terminations in your app   Apple Developer Documentation," <a href="https://developer.apple.com/documentation/xcode/reduce-terminations-in-your-app">https://developer.apple.com/documentation/xcode/reduce-terminations-in-your-app</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0926	n/a	4/15/2024 (accessed)	Apple, "Swift   Apple Developer," <a href="https://developer.apple.com/swift/">https://developer.apple.com/swift/</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0927	n/a	4/29/2024 (accessed)	Apple, "User privacy and data use - App Store - Apple Developer," <a href="https://developer.apple.com/app-store/user-privacy-and-data-use/">https://developer.apple.com/app-store/user-privacy-and-data-use/</a> , accessed April 29, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0928	n/a	9/13/2016	Apple, "What's new in iOS 10 - Apple Newsroom," <a href="https://www.apple.com/newsroom/2016/09/whats-new-in-ios-10/">https://www.apple.com/newsroom/2016/09/whats-new-in-ios-10/</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0929	n/a	4/15/2024 (accessed)	Apple, "Xcode 15   Apple Developer," <a href="https://developer.apple.com/xcode/">https://developer.apple.com/xcode/</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0930	n/a	1/6/2023	AppMySite, "Android vs iOS: Mobile Operating System market share statistics you must know," <a href="https://www.appmysite.com/blog/android-vs-ios-mobile-operatingsystem-market-share-statistics-you-must-know/">https://www.appmysite.com/blog/android-vs-ios-mobile-operatingsystem-market-share-statistics-you-must-know/</a> , accessed April 17, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0931	n/a	1/23/2024	AppMySite, "What is an IPA file and how can you open one?," <a href="https://www.appmysite.com/blog/what-is-an-ipa-file-and-how-can-you-open-one/">https://www.appmysite.com/blog/what-is-an-ipa-file-and-how-can-you-open-one/</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	



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0932	n/a	11/2/2023	AppsFlyer, "Impact of Apple Limit Ad Tracking on attribution (before iOS 14)," <a href="https://support.appsflyer.com/hc/en-us/articles/115003734626-Impact-of-Apple-Limit-Ad-Tracking-on-attribution-before-iOS-14">https://support.appsflyer.com/hc/en-us/articles/115003734626-Impact-of-Apple-Limit-Ad-Tracking-on-attribution-before-iOS-14</a> , accessed April 2, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0933	n/a	3/29/2024 (accessed)	AppsFlyer, "Meta ads integration setup," <a href="https://support.appsflyer.com/hc/en-us/articles/207033826-Meta-ads-integration-setup">https://support.appsflyer.com/hc/en-us/articles/207033826-Meta-ads-integration-setup</a> , accessed March 29, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0934	n/a	4/22/2024 (accessed)	AppsFlyer, "What is limit ad tracking?," <a href="https://www.appsflyer.com/glossary/limit-ad-tracking/">https://www.appsflyer.com/glossary/limit-ad-tracking/</a> , accessed April 22, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0935	n/a	5/8/2023 (accessed)	Apptopia, "About: Flo Ovulation & Period Tracker (Google Play version)," <a href="https://apptopia.com/google-play/app/org.iggymedia.periodtracker/about">https://apptopia.com/google-play/app/org.iggymedia.periodtracker/about</a> , accessed May 8, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0936	n/a	n/a	Apptopia, "About: Flo Period Tracker & Calendar," <a href="https://apptopia.com/unified/app/8126583949/about">https://apptopia.com/unified/app/8126583949/about</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0937	n/a	1/19/2022	Bilal, Ahmad, "General Techniques of API Caching," Rapid, <a href="https://rapidapi.com/guides/api-caching-techniques">https://rapidapi.com/guides/api-caching-techniques</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0938	n/a	5/19/2023	Codex, Arthur C., "Mastering the iOS App Life Cycle: From Launch to Termination," Reintech, <a href="https://reintech.io/blog/mastering-ios-app-life-cycle">https://reintech.io/blog/mastering-ios-app-life-cycle</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0939	n/a	5/11/2022	Cyphers, Bennett, "How to Disable Ad ID Tracking on iOS and Android, and Why You Should Do It Now," Electronic Frontier Foundation, <a href="https://www.eff.org/deeplinks/2022/05/how-disable-ad-id-tracking-ios-and-android-and-why-you-should-do-it-now">https://www.eff.org/deeplinks/2022/05/how-disable-ad-id-tracking-ios-and-android-and-why-you-should-do-it-now</a> , accessed April 22, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0940	n/a	3/29/2024 (accessed)	Flo Privacy Policy (archived), <a href="https://flo.health/privacy-policy-archived">https://flo.health/privacy-policy-archived</a> , accessed March 29, 2024	n/a			G. Zervas; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization, Expert Foundation	-		-	
0941	n/a	4/24/2024 (accessed)	Github, "Issues · facebook/facebook-ios-sdk," <a href="https://github.com/facebook/facebook-ios-sdk/issues">https://github.com/facebook/facebook-ios-sdk/issues</a> , accessed April 24, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0942	n/a	4/2/2024 (accessed)	Global App Testing, The State of Consumer App Habits, 2020, <a href="https://f.hubspotusercontent30.net/hubfs/540930/The%20State%20of%20Consumer%20App%20Habits%202020.pdf">https://f.hubspotusercontent30.net/hubfs/540930/The%20State%20of%20Consumer%20App%20Habits%202020.pdf</a> , accessed April 2, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

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0943	n/a	4/29/2024	Google, "Advertising ID," <a href="https://support.google.com/googleplay/androiddeveloper/answer/6048248">https://support.google.com/googleplay/androiddeveloper/answer/6048248</a> , accessed April 29, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0944	n/a	8/2/2016	Gray, Stacey, "iOS 10 to Feature Stronger 'Limit Ad Tracking' Control," Future of Privacy Forum, <a href="https://fpf.org/blog/ios-10-feature-stronger-limit-ad-tracking/">https://fpf.org/blog/ios-10-feature-stronger-limit-ad-tracking/</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0945	n/a	1/30/2024	Hanson, Scott, "Benefits of Using SDKs in Improving the User Experience of Educational Software and Apps," Kitaboo, <a href="https://kitaboo.com/sdk-to-improveeducational-software-ux/">https://kitaboo.com/sdk-to-improveeducational-software-ux/</a> , accessed April 2, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0946	n/a	7/13/2021	IBM Cloud Education, "SDK vs. API: What's the Difference?," <a href="https://www.ibm.com/cloud/blog/sdk-vs-api">https://www.ibm.com/cloud/blog/sdk-vs-api</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0947	n/a	4/17/2023 (accessed)	Joby, Amal, "Mobile Apps," G2, <a href="https://www.g2.com/glossary/mobile-apps">https://www.g2.com/glossary/mobile-apps</a> , accessed April 17, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0948	n/a	10/12/2023	Kravets, Andrii, "Navigating App Bugs: Common Types and Bug Examples," Forbytes, <a href="https://forbytes.com/blog/app-bugs-meaning/">https://forbytes.com/blog/app-bugs-meaning/</a> , accessed April 2, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0949	n/a	12/30/2023	Kurzweg, Jonas, "How to set up mobile app event tracking – the complete guide for 2024," UXCam, <a href="https://uxcam.com/blog/mobile-app-event-tracking/">https://uxcam.com/blog/mobile-app-event-tracking/</a> , accessed March 31, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0950	n/a	10/30/2023	Kurzweg, Jonas, "Top Analytics SDKs 2024 [Updated]," UXCam, <a href="https://uxcam.com/blog/top-analytics-sdks/">https://uxcam.com/blog/top-analytics-sdks/</a> , accessed March 31, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0951	n/a	1/31/2019	M, Shivkumar, "What is an SDK? Everything You Need to Know," CleverTap, <a href="https://clevertap.com/blog/what-is-an-sdk/">https://clevertap.com/blog/what-is-an-sdk/</a> , accessed April 1, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0952	n/a	9/25/2023	mDevelopers, "What Does It Mean When an App Has a Bug?," <a href="https://mdevelopers.com/blog/understanding-software-bugs-causes-impact-solutions">https://mdevelopers.com/blog/understanding-software-bugs-causes-impact-solutions</a> , accessed April 2, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0953	n/a	4/19/2023 (accessed)	Meta, "About app events and advertising on Facebook and Instagram - Meta Business Help Center," <a href="https://www.facebook.com/business/help/235457266642587">https://www.facebook.com/business/help/235457266642587</a> , accessed April 19, 2023	n/a			A. Lapitski; G. Zervas; B. Zhu; F. Leach; T. Frantsuzenko	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0954	n/a	4/27/2023 (accessed)	Meta, "Changelog - Facebook SDK for Android," <a href="https://developers.facebook.com/docs/android/change-log-4x">https://developers.facebook.com/docs/android/change-log-4x</a> , accessed April 27, 2023	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0955	n/a	5/1/2024 (accessed)	Meta, "Changelog," <a href="https://developers.facebook.com/docs/ios/change-log-4x/">https://developers.facebook.com/docs/ios/change-log-4x/</a> , accessed May 1, 2024	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0956	n/a	4/27/2023 (accessed)	Meta, "Codeless App Events - Meta App Events," <a href="https://developers.facebook.com/docs/appevents/codeless-app-events/">https://developers.facebook.com/docs/appevents/codeless-app-events/</a> , accessed April 27, 2023	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0957	n/a	4/20/2023 (accessed)	Meta, "Facebook Meta App Events," <a href="https://developers.facebook.com/docs/app-events/reference">https://developers.facebook.com/docs/app-events/reference</a> , accessed April 20, 2023	n/a			A. Lapitski; G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0958	n/a	4/17/2023 (accessed)	Meta, "Facebook SDK for Android," Github, <a href="https://github.com/facebook/facebook-android-sdk">https://github.com/facebook/facebook-android-sdk</a> , accessed April 17, 2023	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0959	n/a	4/17/2023 (accessed)	Meta, "Facebook SDK for iOS," Github, <a href="https://github.com/facebook/facebook-ios-sdk">https://github.com/facebook/facebook-ios-sdk</a> , accessed April 17, 2023	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0960	n/a	4/19/2024 (accessed)	Meta, "FAQ - Meta App Events," <a href="https://developers.facebook.com/docs/app-events/faq/">https://developers.facebook.com/docs/app-events/faq/</a> , accessed April 19, 2024	n/a			A. Lapitski; G. Zervas; B. Zhu; F. Leach; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0961	n/a	3/2/2017	Meta, "FBSDKAppEvents," Wayback Machine, as of March 2, 2017, <a href="https://web.archive.org/web/20170302061843/https://developers.facebook.com/docs/reference/ios/current/class/FBSDKAppEvents/">https://web.archive.org/web/20170302061843/https://developers.facebook.com/docs/reference/ios/current/class/FBSDKAppEvents/</a>	n/a			G. Zervas; B. Zhu; F. Leach; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0962	n/a	4/19/2024 (accessed)	Meta, "Get Started - Facebook SDK for iOS," <a href="https://developers.facebook.com/docs/ios/gettingstarted">https://developers.facebook.com/docs/ios/gettingstarted</a> , accessed April 19, 2023	n/a			G. Zervas; B. Zhu; F. Leach; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0963	n/a	4/20/2023 (accessed)	Meta, "Get Started with App Events (Android)," <a href="https://developers.facebook.com/docs/appevents/getting-started-app-events-android">https://developers.facebook.com/docs/appevents/getting-started-app-events-android</a> , accessed April 20, 2023	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0964	n/a	4/20/2023 (accessed)	Meta, "Get Started with App Events (iOS)," <a href="https://developers.facebook.com/docs/appevents/getting-started-app-events-ios">https://developers.facebook.com/docs/appevents/getting-started-app-events-ios</a> , accessed April 20, 2023	n/a			G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0965	n/a	4/19/2023 (accessed)	Meta, "Getting Started - Facebook SDK for Android," <a href="https://developers.facebook.com/docs/android/getting-started">https://developers.facebook.com/docs/android/getting-started</a> , accessed April 19, 2023	n/a			G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0966	n/a	5/8/2023 (accessed)	Meta, "HelloFacebookSample," Github, <a href="https://github.com/facebook/facebook-androidsdk/tree/main/samples&gt;HelloFacebookSample">https://github.com/facebook/facebook-androidsdk/tree/main/samples&gt;HelloFacebookSample</a> , accessed May 8, 2023	n/a			G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

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0967	n/a	4/25/2023	Meta, "Meta Business Tools Terms," <a href="https://www.facebook.com/legal/terms/business tools">https://www.facebook.com/legal/terms/business tools</a> , effective date April 25, 2023, accessed May 8, 2023	n/a			A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; J. Onuchina	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0968	n/a	4/19/2024 (accessed)	Mozilla, "Client-side storage - MDN Web Docs," <a href="https://developer.mozilla.org/en-US/docs/Learn/JavaScript/Client-side_web_APIs/Client-side_storage">https://developer.mozilla.org/en-US/docs/Learn/JavaScript/Client-side_web_APIs/Client-side_storage</a> , accessed April 19, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0969	n/a	4/25/2022	NetApp, "What is cache flushing?," <a href="https://docs.netapp.com/us-en/eseries/antricity-115/sm-settings/what-is-cache-flushing.html">https://docs.netapp.com/us-en/eseries/antricity-115/sm-settings/what-is-cache-flushing.html</a> , accessed April 19, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0970	n/a	2/1/2013	OSXDaily, "How (& Why) to Reset the Advertising Identifier in iOS," <a href="https://osxdaily.com/2013/02/01/reset-advertising-identifier-ios/">https://osxdaily.com/2013/02/01/reset-advertising-identifier-ios/</a> , accessed April 2, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0971	n/a	6/23/2017	Ramel, David, "Analytics Tops Android SDK List, Firebase Back-End Is Hot," ADTmag, <a href="https://adtmag.com/articles/2017/06/23/android-sdk-report.aspx">https://adtmag.com/articles/2017/06/23/android-sdk-report.aspx</a> , accessed April 29, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0972	n/a	8/7/2020	Rouse, Margaret, "What is a Mobile Application?," Techopedia, <a href="https://www.techopedia.com/definition/2953/mobile-application-mobile-app">https://www.techopedia.com/definition/2953/mobile-application-mobile-app</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0973	n/a	5/5/2023	Samanta, Orvill, "What is Limit Ad Tracking (LAT)?," Priori Data, <a href="https://prioridata.com/glossary/limit-ad-tracking">https://prioridata.com/glossary/limit-ad-tracking</a> , accessed April 18, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0974	n/a	8/8/2016	Seufert, Eric Benjamin, "IDFA zeroing in iOS 10 will change mobile advertising," <a href="https://mobiledevmemo.com/idfa-zeroing-ios-10-change-mobile-advertising">https://mobiledevmemo.com/idfa-zeroing-ios-10-change-mobile-advertising</a> , accessed April 23, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0975	n/a	10/13/2022	Shah, Parth, "Top 8 Ways to Fix Apps Not Updating Automatically on iPhone," Guiding Tech, <a href="https://www.guidingtech.com/fix-apps-not-updating-automatically-oniphone/">https://www.guidingtech.com/fix-apps-not-updating-automatically-oniphone/</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0976	n/a	11/21/2023	Shchegolskiy, Iurii, "In-App Events: What to Track in an App & Why," adjoe, <a href="https://adjo.io/glossary/in-app-events/">https://adjo.io/glossary/in-app-events/</a> , accessed April 19, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0977	n/a	4/15/2024 (accessed)	Situm, "04 – Foreground & Background execution," <a href="https://situm.com/docs/foreground-background-execution/">https://situm.com/docs/foreground-background-execution/</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

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0978	n/a	4/18/2024 (accessed)	SOS Support, "Android VS IOS Market Share Per Country 2022," <a href="https://www.sosupport.net/blog/android-vs-ios-market-share-per-country-2022">https://www.sosupport.net/blog/android-vs-ios-market-share-per-country-2022</a> , accessed April 18, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0979	n/a	5/1/2024 (accessed)	Stripe, "Security at Strip   Stripe Documentation," <a href="https://docs.stripe.com/security">https://docs.stripe.com/security</a> , accessed May 1, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0980	n/a	4/15/2024 (accessed)	Studytonight, "Android Activity, its Lifecycle and States - Android Development Tutorial," <a href="https://www.studytonight.com/android/activity-in-android">https://www.studytonight.com/android/activity-in-android</a> , accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0981	n/a	2/10/2023	Thomas, Dana, "Using caching strategies to improve API performance," <a href="https://www.torocloud.com/blog/using-caching-strategies-to-improve-api-performance">https://www.torocloud.com/blog/using-caching-strategies-to-improve-api-performance</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0982	n/a	3/7/2023	Virtual Spirit Technology, "A Complete Guide on Securing Third-Party APIs in Mobile Apps," <a href="https://virtualspirit.me/insights/169/a-complete-guide-on-securing-thirdparty-apis-in-mobile-apps">https://virtualspirit.me/insights/169/a-complete-guide-on-securing-thirdparty-apis-in-mobile-apps</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0983	n/a	11/9/2023	Zibreg, Christian, "One out of five iPhone users in the U.S. have Limit Ad Tracking turned on," iDownloadBlog, <a href="https://www.idownloadblog.com/2016/10/17/oneout-of-five-iphone-users-in-the-u-s-have-limit-ad-tracking-turned-on/">https://www.idownloadblog.com/2016/10/17/oneout-of-five-iphone-users-in-the-u-s-have-limit-ad-tracking-turned-on/</a> , accessed April 22, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0984			org.iggymedia.periodtracker-1-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0985			org.iggymedia.periodtracker-25-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0986			org.iggymedia.periodtracker-56-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0987			org.iggymedia.periodtracker-74-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0988			org.iggymedia.periodtracker-50000-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0989			org.iggymedia.periodtracker-60000-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0990			ios-1	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0991			ios-2	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	

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0992			ios-3	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0993			ios-4	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross-Examination	-		-	
0994	n/a	9/21/2023	Plaintiffs' Motion for Class Certification	Under Seal			Plaintiffs	Relevant Background	-		-	
0995	n/a	Jul-14	Arapakis, Ioannis, Xiao Bai, and B. Barla Cambazoglu, "Impact of Response Latency on User Behavior in Web Search," Association for Computing Machinery, pp. 103-112	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0996	n/a	10/28/2021	Berisha, Visar, Chelsea Krantsevich, P. Richard Hahn, Shira Hahn, Gautam Dasarathy, Pavan Turaga, and Julie Liss, "Digital medicine and the curse of dimensionality," npj Digital Medicine, Vol. 4, No. 153	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0997	n/a	Dec. 1997	Blum, Avrim L., and Pat Langley, Selection of relevant features and examples in machine learning Vol. 97, Artificial Intelligence	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0998	n/a	2019	Burkov, Andriy, The Hundred-Page Machine Learning Book	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0999	n/a	9/5/2021	Gupta, Nitin, Hima Patel, Shazia Afzal, Naveen Panwar, Ruhi Sharma Mittal, Shanmukha Guttula, . . . Diptikalyan Saha, "Data Quality Toolkit: Automatic assessment of data quality and remediation for machine learning datasets"	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1000	n/a	2015	Kelleher, John D., Brian Mac Namee, and Aoife D'Arcy, Fundamentals of Machine Learning for Predictive Data Analytics, MIT Press	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1001	n/a	Aug. 2017	Liu, Yu-Hsin, Jeffrey Prince, and Scott Wallsten, "Distinguishing Bandwidth and Latency in Households' Willingness-to-Pay for Broadband Internet Speed"	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1002	n/a	2016	Miao, Jianyu, and Lingfeng Niu, "A Survey on Feature Selection," Procedia Computer Science, Vol. 91, pp. 919-926	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1003	n/a	11/7/2021	Northcutt, Curtis G., Anish Athalye, and Jonas Mueller, "Pervasive Label Errors in Test Sets Destabilize Machine Learning Benchmarks," 35th Conference on Neural Information Processing Systems Track on Datasets and Benchmarks	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1004	n/a	2024	William H. Clark, IV and Alan J. Michaels, "Training from Zero: Radio Frequency Machine Learning Data Quantity Forecasting"	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1005	n/a	3/24/2023	Advisory Board, "IBM's Watson recommended 'unsafe and incorrect' treatments for cancer patients, investigation reveals," <a href="https://www.advisory.com/dailybriefing/2018/07/27/ibm">https://www.advisory.com/dailybriefing/2018/07/27/ibm</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1006	n/a	6/3/2024 (accessed)	Branch, "Advertising Identifiers for Attribution," <a href="https://help.branch.io/usingbranch/docs/advertising-identifiers-for-attribution">https://help.branch.io/usingbranch/docs/advertising-identifiers-for-attribution</a> , accessed June 3, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1007	n/a	6/28/2024 (accessed)	Branch, "IP Addresses," <a href="https://www.branch.io/glossary/ip-addresses/">https://www.branch.io/glossary/ip-addresses/</a> , accessed June 28, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1008	n/a	6/28/2024 (accessed)	Butvinik, Danny, "Feature Selection – All You Ever Wanted To Know," KDnuggets, <a href="https://www.kdnuggets.com/2021/06/feature-selection-overview.html">https://www.kdnuggets.com/2021/06/feature-selection-overview.html</a> , accessed June 28, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1009	n/a	4/25/2013	Cutler, Kim-Mai, and Josh Constine, "Facebook Buys Parse To Offer Mobile Development Tools As Its First Paid B2B Service," TechCrunch, <a href="https://techcrunch.com/2013/04/25/facebook-parse/">https://techcrunch.com/2013/04/25/facebook-parse/</a> , accessed June 28, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1010	n/a	6/16/2023 (accessed)	Epoch Converter, "Unix Timestamp Converter," <a href="https://www.epochconverter.com/">https://www.epochconverter.com/</a> , accessed June 16, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1011	n/a	4/20/2023 (accessed)	Meta, "App Events API - Meta Marketing API," <a href="https://developers.facebook.com/docs/marketingapi/app-event-api">https://developers.facebook.com/docs/marketingapi/app-event-api</a> , accessed April 20, 2023	n/a			A. Lapitski; G. Zervas; E. Dendievel; F. Leach; T. Frantsuzenko	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1012	n/a	6/27/2023 (accessed)	Meta, "AppEventsLogger - Meta for Developers," <a href="https://developers.facebook.com/docs/reference/android/current/classes/AppEventsLogger/">https://developers.facebook.com/docs/reference/android/current/classes/AppEventsLogger/</a> , accessed June 27, 2023	n/a			A. Lapitski; G. Zervas; E. Dendievel; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1013	n/a	3/2/2017	Meta, "AppEventsLogger.FlushBehavior," Wayback Machine, as of March 2, 2017, <a href="https://web.archive.org/web/20170302173441/https://developers.facebook.com/docs/reference/android/current/class/AppEventsLogger.FlushBehavior/">https://web.archive.org/web/20170302173441/https://developers.facebook.com/docs/reference/android/current/class/AppEventsLogger.FlushBehavior/</a> , accessed June 24, 2024	n/a			G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1014	n/a	6/12/2023 (accessed)	Meta, "Facebook SDK for Android Downloads - Meta for Developers," <a href="https://developers.facebook.com/docs/android/downloads/">https://developers.facebook.com/docs/android/downloads/</a> , accessed June 12, 2023	n/a			G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1015	n/a	6/27/2024 (accessed)	mitmproxy, "Certificates," <a href="https://docs.mitmproxy.org/stable/concepts-certificates/">https://docs.mitmproxy.org/stable/concepts-certificates/</a> , accessed June 27, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1016	n/a	6/27/2024 (accessed)	mitmproxy, "Introduction," <a href="https://docs.mitmproxy.org/stable/">https://docs.mitmproxy.org/stable/</a> , accessed June 27, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1017	n/a	8/7/2018	NortonLifeLock, "What does a VPN hide?," <a href="https://us.norton.com/blog/privacy/how-a-vpn-can-help-hide-your-search-history">https://us.norton.com/blog/privacy/how-a-vpn-can-help-hide-your-search-history</a> , accessed June 28, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1018	n/a	4/2/2018	Redman, Thomas C., "If Your Data Is Bad, Your Machine Learning Tools Are Useless," Harvard Business Review, <a href="https://hbr.org/2018/04/if-your-data-is-bad-your-machinelearning-tools-are-useless">https://hbr.org/2018/04/if-your-data-is-bad-your-machinelearning-tools-are-useless</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1019	n/a	4/26/2023	Samanta, Orvill, "What is an Android ID? (AAID)," Priori Data, <a href="https://prioridata.com/glossary/android-id">https://prioridata.com/glossary/android-id</a> , accessed June 3, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1020	n/a	4/26/2021	Smith, Rebecca, "What is IDFA and why is this iOS update important?," Mozilla, <a href="https://blog.mozilla.org/en/interne-t-culture/turn-off-idfa-for-apps-apple-ios-14-5">https://blog.mozilla.org/en/interne-t-culture/turn-off-idfa-for-apps-apple-ios-14-5</a> , accessed June 3, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1021	n/a	5/27/2022	Townshend, Pete, "Browser fingerprinting: Everything you need to know," <a href="https://smartframe.io/blog/browser-fingerprinting-everything-you-need-to-know/">https://smartframe.io/blog/browser-fingerprinting-everything-you-need-to-know/</a>	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1022	n/a	6/28/2024 (accessed)	Yahoo, "Data Storage and Anonymization," <a href="https://legal.yahoo.com/us/en/yahoo/privacy/topics/datastorage/index.html">https://legal.yahoo.com/us/en/yahoo/privacy/topics/datastorage/index.html</a> , accessed June 28, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1023	n/a	Varied	Index of news articles, ranging in date from February 22, 2019 to September 14, 2019, with follow on stories to the <i>Wall Street Journal</i> article	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent		N/A	-	
1024	n/a	2/22/2019	Feiner, Lauren, "Facebook reportedly gets deeply personal info, such as ovulation times and heart rate, from some apps," CNBC	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1025	n/a	2/23/2019	Associated Press, "Apps quietly sharing users' data: Information, such as timing of menstrual cycles, is being sent to Facebook without consent, a report says.," Los Angeles Times	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1026	n/a	2/26/2019	Sumagaysay, Levi, "Some Apps Stop Sharing Sensitive User Data With Facebook After Practice Exposed Heart Rates, Menstrual Cycles, Weight Among Private Information Divulged," San Jose Mercury News	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1027	n/a	n/a	Any documents listed on another party's list	n/a			n/a	See purposes as to the underlying documents	Plaintiffs incorporate their challenges to the admissibility of the underlying documents.	Do we need anything here?	-	
1028	n/a	n/a	Any other publicly available news articles, blog posts, and app reviews concerning whether Flo shared data with Google and/or Meta	n/a			n/a	See purposes as to the underlying documents	Plaintiffs incorporate their challenges to the admissibility of the underlying documents.	Do we need anything here?	-	



Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1029	n/a	n/a	Any rebuttal and/or impeachment documents	n/a			n/a		Not relevant to any claim or defense		-	
1030	n/a		Plaintiff Tesha Gamino's Objections And Responses to Defendants' (Meta Platforms, Inc., Google LLC, and Flurry, LLC) First Set of Interrogatories to Plaintiff Tesha Gamino	Confidential			T. Gamino		Not relevant to any claim or defense; outside class period		-	
1031	n/a		Plaintiff Sarah Wellman's Objections And Responses To Defendants' (Meta Platforms, Inc., Google LLC, And Flurry, LLC) First Set Of Interrogatories To Plaintiff Sarah Wellman	Confidential			S. Wellman		-		-	
1032	n/a	Forthcoming	Declaration of Karan Shah (in lieu of testimony if the parties agree)	n/a			K. Shah; A. Lapitski	Relevant to Absence of Eavesdropping	Not relevant to any claim or defense	Relevant to witness credibility and CIPA 632 claim.	-	
1033	n/a	1/23/2020	USA Today, Trying to get pregnant using a menstrual tracker app? This is what happens to your health data, available at <a href="https://www.usatoday.com/story/tech/2020/01/23/period-tracker-apps-privacy-concerns/4546797002/?utm_source=feedblitz&amp;utm_medium=feedblitzrss&amp;utm_campaign=usatoday-techtopstories">https://www.usatoday.com/story/tech/2020/01/23/period-tracker-apps-privacy-concerns/4546797002/?utm_source=feedblitz&amp;utm_medium=feedblitzrss&amp;utm_campaign=usatoday-techtopstories</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1034	n/a	1/22/2020	Yahoo News, What Your Period Tracker App Knows About You, available at <a href="https://www.yahoo.com/news/period-tracker-app-knows-110002532.html">https://www.yahoo.com/news/period-tracker-app-knows-110002532.html</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1035	n/a	12/17/2019	Refinery 29, Using A Period Tracking App? This Is Where All Your Personal Info Goes, available at <a href="http://www.refinery29.com/en-gb/period-tracking-apps-personal-data">http://www.refinery29.com/en-gb/period-tracking-apps-personal-data</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1036	n/a	7/24/2019	MoonCup, Period tracker apps: when technology met menstruation, available at <a href="https://wearemooncup.com/blogs/the-bloody-bulletin/period-tracker-apps-when-technology-met-menstruation?srsltid=AfmBOoplEzVrQzW-MG5woMzjI09CbVnHqeE9hNy6WEVbBUiBKL3ot5wru">https://wearemooncup.com/blogs/the-bloody-bulletin/period-tracker-apps-when-technology-met-menstruation?srsltid=AfmBOoplEzVrQzW-MG5woMzjI09CbVnHqeE9hNy6WEVbBUiBKL3ot5wru</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1037	n/a	6/7/2019	Medium, Sadaf Khan, Data bleeding everywhere: a story of period trackers, available at <a href="https://deepdives.in/data-bleeding-everywhere-a-story-of-period-trackers-8766dc6a1e00">https://deepdives.in/data-bleeding-everywhere-a-story-of-period-trackers-8766dc6a1e00</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1038	n/a	6/4/2019	MedTech Drive, Apple Watch's newest health addition: menstrual cycle tracking, available at <a href="https://www.medtechdive.com/news/apple-watches-newest-health-addition-menstrual-cycle-tracking/556072/">https://www.medtechdive.com/news/apple-watches-newest-health-addition-menstrual-cycle-tracking/556072/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1039	n/a	3/28/2019	Wall Street Journal Pro, CyberSecurity, Cyber Daily: Personal Data Isn't Your Own; Australian Cyber War; Workers Sue Over Biometrics Collection	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1040	n/a	3/27/2019	Wall Street Journal, Medical Apps Routinely Share User Health Data, Study Shows; Nearly 80% of apps examined share data with third parties, according to new research, available at <a href="https://www.wsj.com/articles/medical-apps-routinely-share-user-health-data-study-shows-11553723652">https://www.wsj.com/articles/medical-apps-routinely-share-user-health-data-study-shows-11553723652</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1041	n/a	3/21/2019	The New Daily, Data sharing by popular health apps found to be 'routine', available at <a href="https://www.thenewdaily.com.au/life/tech/2019/03/21/health-apps-data-share">https://www.thenewdaily.com.au/life/tech/2019/03/21/health-apps-data-share</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1042	n/a	3/5/2019	MarketWatch, Fitness and health apps may be sharing the most private details about your life; There's not enough oversight for apps that track everything from people's fitness routines to their menstrual cycles, bioethicists say, available at <a href="https://www.marketwatch.com/story/fitness-and-health-apps-may-be-sharing-the-most-private-details-about-your-life-2019-02-26">https://www.marketwatch.com/story/fitness-and-health-apps-may-be-sharing-the-most-private-details-about-your-life-2019-02-26</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1043	n/a	3/1/2019	American Health Line, Your iPhone might be secretly sharing private health data with Facebook	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense; outside class period	Relevant to SOL affirmative defense, even if outside class period.	-	
1044	n/a	2/28/2019	The HIPAA Guide, Third-Party Apps' Health Data Sharing With Facebook Investigated, available at <a href="https://www.hipaaguide.net/third-party-apps-health-data-sharing-with-facebook-investigated/">https://www.hipaaguide.net/third-party-apps-health-data-sharing-with-facebook-investigated/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1045	n/a	2/28/2019	Serendipity 35, Even Facebook Wishes it Could Clear its History, available at <a href="https://serendipity35.net/index.php/archives/3553-even-facebook-wishes-it-could-clear-its-history.html">https://serendipity35.net/index.php/archives/3553-even-facebook-wishes-it-could-clear-its-history.html</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1046	n/a	2/27/2019	iCrowdNewswire, Apps makers are sharing sensitive personal information with Facebook but not telling users	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1047	n/a	2/27/2019	Newsroom, Apps give Facebook sensitive data, available at <a href="https://newsroom.co.nz/2019/02/27/apps-give-facebook-sensitive-data/">https://newsroom.co.nz/2019/02/27/apps-give-facebook-sensitive-data/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1048	n/a	2/26/2019	San Jose Mercury News, Some Apps Stop Sharing Sensitive User Data with Facebook After Practice Exposed; Heart Rates, Menstrual Cycles, Weight Among Private Information Divulged, available at <a href="https://www.mercurynews.com/2019/02/25/some-apps-stop-sharing-sensitive-user-data-with-facebook-after-practice-exposed/">https://www.mercurynews.com/2019/02/25/some-apps-stop-sharing-sensitive-user-data-with-facebook-after-practice-exposed/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1049	n/a	2/25/2019	The East Bay Times, Some apps stop sharing sensitive user data with Facebook after practice exposed, available at <a href="https://www.eastbaytimes.com/2019/02/25/some-apps-stop-sharing-sensitive-user-data-with-facebook-after-practice-exposed/">https://www.eastbaytimes.com/2019/02/25/some-apps-stop-sharing-sensitive-user-data-with-facebook-after-practice-exposed/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1050	n/a	2/25/2019	Hot Hardware, These Popular Health And Fitness Apps Shared Highly Personal Data With Facebook, available at <a href="https://hothardware.com/news/health-apps-stop-sharing-data-with-facebook">https://hothardware.com/news/health-apps-stop-sharing-data-with-facebook</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1051	n/a	2/25/2019	Cool Mom Tech, Are your favorite apps sharing your personal data with Facebook, even if you're not on Facebook? The answer is yes., available at <a href="https://coolmomtech.com/2019/02/favorite-apps-sharing-personal-data-with-facebook/">https://coolmomtech.com/2019/02/favorite-apps-sharing-personal-data-with-facebook/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1052	n/a	2/25/2019	Fox News, Popular apps cease sharing data with Facebook, available at <a href="https://www.foxnews.com/tech/popular-apps-cease-sharing-data-with-facebook">https://www.foxnews.com/tech/popular-apps-cease-sharing-data-with-facebook</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1053	n/a	2/25/2019	CE Noticias Financieras, Several mobile applications stop sharing sensitive information from users with Facebook	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1054	n/a	2/25/2019	Stuff, Facebook quietly collects sensitive data from apps - report, available at <a href="https://www.stuff.co.nz/business/110859613/Facebook-quietly-collects-sensitive-data-from-apps-report">https://www.stuff.co.nz/business/110859613/Facebook-quietly-collects-sensitive-data-from-apps-report</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1055	n/a	2/25/2019	Tech Juice, These apps are sharing your personal data with Facebook, available at <a href="https://www.techjuice.pk/these-apps-are-sharing-your-personal-data-with-facebook/">https://www.techjuice.pk/these-apps-are-sharing-your-personal-data-with-facebook/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1056	n/a	2/25/2019	Smays.com, More apps caught sending personal info to Facebook, available at <a href="https://www.smays.com/2019/02/ios-facebook/">https://www.smays.com/2019/02/ios-facebook/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1057	n/a	2/25/2019	The Life's Truth, Smartphone Apps shares personal data with Facebook, available at <a href="https://abdhuraf.wordpress.com/2019/02/25/smartphone-apps-shares-personal-data-with-facebook/">https://abdhuraf.wordpress.com/2019/02/25/smartphone-apps-shares-personal-data-with-facebook/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1058	n/a	2/25/2019	Edge Media Network, Report: Apps Give Facebook Sensitive Health and Other Data, available at <a href="https://www.edgemedianetwork.com/story/272777">https://www.edgemedianetwork.com/story/272777</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1059	n/a	2/25/2019	Daze Info, Popular iOS Apps Are Sharing Sensitive User Data With Facebook, available at <a href="https://dazeinfo.com/2019/02/25/popular-ios-apps-sharing-user-data-facebook/">https://dazeinfo.com/2019/02/25/popular-ios-apps-sharing-user-data-facebook/</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1060	n/a	2/24/2019	Wall Street Journal, Eleven Popular Apps That Shared Data With Facebook ; Five have ceased doing so after being contacted by The Wall Street Journal, available at <a href="https://wsj.com/articles/eleven-popular-apps-that-shared-data-with-facebook-11551055132">https://wsj.com/articles/eleven-popular-apps-that-shared-data-with-facebook-11551055132</a>	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1061	n/a	2/24/2019	Eureka Times-Standard, Report shows apps send sensitive user data to Facebook	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1062	n/a	2/24/2019	The Bismarck Tribune, Report: Apps give Facebook sensitive health, other data	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1063	n/a	2/24/2019	Bru Direct, Multiple Ios Apps Are Reportedly Sharing Sensitive Data With Facebook	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consent	Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1064	n/a	2/24/2019	Financial Express Online, Facebook in the dock over app that reveals period dates of its users, available at <a href="https://www.financialexpress.com/life/technology-facebook-slammed-privacy-norms-violation-accesses-personal-info-like-weight-ovulation-status-using-third-party-apps-1497069/#:~:text=Among%20the se%20included%20Flo%20Period,it%20%E2%80%9Cprohibits%20app%20developers%20from">https://www.financialexpress.com/life/technology-facebook-slammed-privacy-norms-violation-accesses-personal-info-like-weight-ovulation-status-using-third-party-apps-1497069/#:~:text=Among%20the se%20included%20Flo%20Period,it%20%E2%80%9Cprohibits%20app%20developers%20from</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1065	n/a	2/24/2019	Valley News Live, Use an app to track your period? That data and more could end up with Facebook, WSJ reports, available at <a href="https://web.archive.org/web/20190224192625/https://www.valleynewslive.com/content/news/use-an-app-to-track-your-period-that-data-and-more-could-end-up-with-facebook-wsj-reports-506291911.html">https://web.archive.org/web/20190224192625/https://www.valleynewslive.com/content/news/use-an-app-to-track-your-period-that-data-and-more-could-end-up-with-facebook-wsj-reports-506291911.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1066	n/a	2/24/2019	The intersection of Technology and Humanity, Ken Garen CPA, You Give Apps Sensitive Personal Information. Then They Tell Facebook..."This is a big mess," available at <a href="https://ubeckengaren.blogspot.com/2019/02/you-give-apps-sensitive-personal.html">https://ubeckengaren.blogspot.com/2019/02/you-give-apps-sensitive-personal.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1067	n/a	2/24/2019	Digital Information World, Various Android and iOS apps are sharing health data with Facebook, without user consent, available at <a href="https://www.digitalinformationworld.com/2019/02/you-give-apps-your-data-then-they-tell-facebook.html">https://www.digitalinformationworld.com/2019/02/you-give-apps-your-data-then-they-tell-facebook.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1068	n/a	2/24/2019	Ghovexx Review, Smartphone Apps Sending "Intensely Personal Information" To Facebook, Whether Or Not You Have An Account, available at <a href="https://ghovexx.blogspot.com/2019/02/smartphone-apps-sending-intensely.html#main">https://ghovexx.blogspot.com/2019/02/smartphone-apps-sending-intensely.html#main</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1069	n/a	2/23/2019	The Lethbridge Herald, Phone apps giving data to Facebook: report; Developers USE Info To Target Users While On The Site	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1070	n/a	2/23/2019	Marin Independent Journal, Report warns apps send sensitive user data to Facebook	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1071	n/a	2/23/2019	The Seattle Times, Apps give Facebook sensitive health, other data: report, available at <a href="https://www.seattletimes.com/business/report-apps-send-sensitive-user-data-to-facebook/">https://www.seattletimes.com/business/report-apps-send-sensitive-user-data-to-facebook/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1072	n/a	2/23/2019	Boy Genius Report, Of course some apps are sharing private health details with Facebook, available at <a href="https://bgr.com/business/facebook-health-data-personal-details-apps/">https://bgr.com/business/facebook-health-data-personal-details-apps/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1073	n/a	2/23/2019	Boston Herald, Report: Apps feeding sensitive data to Facebook	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1074	n/a	2/23/2019	Monterey County Herald, Report: Apps send sensitive user data to Facebook	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1075	n/a	2/23/2019	Telegraph Herald, Report: Apps give Facebook sensitive health data	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1076	n/a	2/23/2019	International Business Times, Facebook Harvesting User Data From Heart Rate, Ovulation iOS Apps, <a href="https://www.ibtimes.com/facebook-harvesting-user-data-heart-rate-ovulation-ios-apps-2767445">https://www.ibtimes.com/facebook-harvesting-user-data-heart-rate-ovulation-ios-apps-2767445</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1077	n/a	2/23/2019	Los Angeles Times, Several apps funnel users' sensitive data to Facebook without consent, report says, <a href="https://www.latimes.com/business/technology/la-fi-tn-apps-facebook-private-data-20190222-story.html">https://www.latimes.com/business/technology/la-fi-tn-apps-facebook-private-data-20190222-story.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1078	n/a	2/23/2019	The Guardian, Facebook attacked over app that reveals period dates of its users; Sensitive data sent to social media giant from 'at least 11' platforms, available at <a href="https://www.theguardian.com/technology/2019/feb/23/facebook-app-data-leaks">https://www.theguardian.com/technology/2019/feb/23/facebook-app-data-leaks</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1079	n/a	2/23/2019	Daily News of Los Angeles, Apps give Facebook sensitive health data	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1080	n/a	2/23/2019	Australian Broadcasting Corporation, Facebook under fire over claims it knows when users are having their periods, <a href="https://www.abc.net.au/news/2019-02-24/facebook-under-fire-over-report-its-accessing-your-personal-info/10844156">https://www.abc.net.au/news/2019-02-24/facebook-under-fire-over-report-its-accessing-your-personal-info/10844156</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1081	n/a	2/23/2019	Axios, Facebook tracks highly personal details through apps, available at <a href="https://www.axios.com/2019/02/23/facebook-tracks-personal-data-through-apps">https://www.axios.com/2019/02/23/facebook-tracks-personal-data-through-apps</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1082	n/a	2/23/2019	Orange County Register, Apps Give Facebook Sensitive Health Data	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1083	n/a	2/23/2019	Daily Post, Facebook receives private health info, Including whether women ovulating	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1084	n/a	2/23/2019	The Observer, Facebook attacked over app that reveals period dates of its users	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1085	n/a	2/23/2019	Vaaju, Apps sends sensitive health data to Facebook – News Digital: Mobile, available at <a href="https://vaaju.com/switzerland/apps-sends-sensitive-health-data-to-facebook-news-digital-mobile/">https://vaaju.com/switzerland/apps-sends-sensitive-health-data-to-facebook-news-digital-mobile/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1086	n/a	2/23/2019	Euro News, Some apps send data about menstruation, home buying to Facebook, WSJ reports, available at <a href="https://www.euronews.com/2019/02/22/some-apps-send-data-about-menstruation-home-buying-facebook-wsj-n974711">https://www.euronews.com/2019/02/22/some-apps-send-data-about-menstruation-home-buying-facebook-wsj-n974711</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1087	n/a	2/23/2019	I Web Guy Blog, Facebook Being Sent Sensitive User Data by Several Apps: Report, available at <a href="https://iwebguyblog.wordpress.com/2019/02/23/facebook-being-sent-sensitive-user-data-by-several-apps-report/#post-17139">https://iwebguyblog.wordpress.com/2019/02/23/facebook-being-sent-sensitive-user-data-by-several-apps-report/#post-17139</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1088	n/a	2/23/2019	John Brown's Notes and Essays, You Give Apps Sensitive Personal Information. Then They Tell Facebook., available at <a href="https://johnbrownnotesandessays.blogspot.com/2019/02/you-give-apps-sensitive-personal.html">https://johnbrownnotesandessays.blogspot.com/2019/02/you-give-apps-sensitive-personal.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1089	n/a	2/22/2019	Postmedia Breaking News, Report: Apps send sensitive user data to Facebook	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1090	n/a	2/22/2019	Mashable, Period tracking app says it will stop sharing health data with Facebook, available at <a href="https://mashable.com/article/flo-period-tracking-app-will-stop-sharing-data-with-facebook">https://mashable.com/article/flo-period-tracking-app-will-stop-sharing-data-with-facebook</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1091	n/a	2/22/2019	Associated Press, Report: Apps give facebook sensitive health, other data, available at <a href="https://apnews.com/article/a3f5a3a5663b49c4b909da1353ec03da">https://apnews.com/article/a3f5a3a5663b49c4b909da1353ec03da</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1092	n/a	2/22/2019	Mail Online, How Facebook harvests your personal data from popular apps: At least a dozen popular apps secretly share 'highly sensitive' data without users' consent, available at <a href="https://www.dailymail.co.uk/sciencetech/article-6734805/Facebook-secretly-collects-highly-sensitive-data-popular-apps.html">https://www.dailymail.co.uk/sciencetech/article-6734805/Facebook-secretly-collects-highly-sensitive-data-popular-apps.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1093	n/a	2/22/2019	The Denver Post, Report: Apps send sensitive user data to Facebook without their consent, available at <a href="https://www.denverpost.com/2019/02/22/facebook-apps-send-sensitive-data/amp/">https://www.denverpost.com/2019/02/22/facebook-apps-send-sensitive-data/amp/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1094	n/a	2/22/2019	CNET, Facebook receives personal info like your heart rate from popular apps, available at <a href="https://www.cnet.com/tech/services-and-software/facebook-receives-personal-info-like-your-heart-rate-from-popular-apps/">https://www.cnet.com/tech/services-and-software/facebook-receives-personal-info-like-your-heart-rate-from-popular-apps/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1095	n/a	2/22/2019	Business Insider, Apps are reportedly telling Facebook how much users weigh and when they're menstruating (FB), available at <a href="https://www.businessinsider.com/facebook-sensitive-data-apps-2019-2">https://www.businessinsider.com/facebook-sensitive-data-apps-2019-2</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1096	n/a	2/22/2019	MacRumors, Some iOS Apps Sending an Alarming Amount of Data to Facebook and Most Users Are Unaware, available at <a href="https://www.macrumors.com/2019/02/22/ios-apps-sending-private-data-to-facebook/">https://www.macrumors.com/2019/02/22/ios-apps-sending-private-data-to-facebook/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1097	n/a	2/22/2019	Canadian Press, Report: Apps give Facebook sensitive health and other data	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1098	n/a	2/22/2019	iPhone in Canada, Popular iOS Apps are Stealing Your Private Data via Facebook SDK: WSJ, available at <a href="https://www.iphoneincanada.ca/2019/02/22/apps-stealing-private-data-via-facebook/">https://www.iphoneincanada.ca/2019/02/22/apps-stealing-private-data-via-facebook/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1099	n/a	2/22/2019	Mail Online, WHAT APPS ARE SHARING YOUR DATA WITH FACEBOOK?, available at <a href="https://www.dailymail.co.uk/sciencetech/fb-6735041/WHAT-APPS-SHARING-DATA-FACEBOOK.html">https://www.dailymail.co.uk/sciencetech/fb-6735041/WHAT-APPS-SHARING-DATA-FACEBOOK.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	

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1100	n/a	2/22/2019	CBS News, Facebook reportedly received users' sensitive health data from apps: "It's incredibly dishonest", available at <a href="https://www.cbsnews.com/news/facebook-reportedly-received-sensitive-health-data-from-apps-without-consent/">https://www.cbsnews.com/news/facebook-reportedly-received-sensitive-health-data-from-apps-without-consent/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1101	n/a	2/22/2019	NBC News, Use an app to track your period? That data and more could end up with Facebook, WSJ reports, available at <a href="https://www.nbcnews.com/tech/tech-news/some-apps-send-data-about-menstruation-home-buying-facebook-wsj-n974711">https://www.nbcnews.com/tech/tech-news/some-apps-send-data-about-menstruation-home-buying-facebook-wsj-n974711</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1102	n/a	2/22/2019	CNBC, Facebook reportedly gets deeply personal info, such as ovulation times and heart rate, from some apps, available at <a href="https://www.cnbc.com/2019/02/22/facebook-receives-personal-health-data-from-apps-wsj.html">https://www.cnbc.com/2019/02/22/facebook-receives-personal-health-data-from-apps-wsj.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1103	n/a	2/22/2019	Yahoo, Multiple iOS apps are reportedly sharing sensitive data with Facebook, available at <a href="https://sg.finance.yahoo.com/news/2019-02-22-facebook-data-sharing-body-weight-period.html?guccounter=1&amp;guce_referrer=aHR0cHM6Ly93d3cuZm9vZ2xLLmNvbS8&amp;guce_referrer_sig=AQAAAMJ1RH2XKw_XDWlss92qRMylO0A3evaVAGYgNKm2o_O0GHIO85Tyngk-wRVL5hfPvjeiN72XSG6-P5SfrDywSCTAIFFRnUx5LmbPQX2OXViQIc8zk9Ma_aplAfMv7Bnhfjihs0_LGunKxLl38xiw8MszJKCsjXaAUojsTFtc">https://sg.finance.yahoo.com/news/2019-02-22-facebook-data-sharing-body-weight-period.html?guccounter=1&amp;guce_referrer=aHR0cHM6Ly93d3cuZm9vZ2xLLmNvbS8&amp;guce_referrer_sig=AQAAAMJ1RH2XKw_XDWlss92qRMylO0A3evaVAGYgNKm2o_O0GHIO85Tyngk-wRVL5hfPvjeiN72XSG6-P5SfrDywSCTAIFFRnUx5LmbPQX2OXViQIc8zk9Ma_aplAfMv7Bnhfjihs0_LGunKxLl38xiw8MszJKCsjXaAUojsTFtc</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1104	n/a	2/22/2019	EnGadget, Multiple iOS apps are reportedly sharing sensitive data with Facebook (updated), available at <a href="https://www.engadget.com/2019-02-22-facebook-data-sharing-body-weight-period.html">https://www.engadget.com/2019-02-22-facebook-data-sharing-body-weight-period.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1105	n/a	2/22/2019	Scripps News, WSJ: Several Apps Are Sharing Sensitive Data with Facebook, available at <a href="https://www.scrippsnews.com/science-and-tech/social-media/apps-share-sensitive-data-with-facebook-not-telling-users">https://www.scrippsnews.com/science-and-tech/social-media/apps-share-sensitive-data-with-facebook-not-telling-users</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1106	n/a	2/22/2019	Androidifying, At least 11 popular apps are secretly giving your private data to Facebook, available at <a href="https://androidifying.blogspot.com/2019/02/at-least-11-popular-apps-are-secretly.html">https://androidifying.blogspot.com/2019/02/at-least-11-popular-apps-are-secretly.html</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1107	n/a	2/22/2019	Android Authority, At least 11 popular apps are secretly giving your private data to Facebook, available at <a href="https://www.androidauthority.com/facebook-partner-apps-privacy-957694/">https://www.androidauthority.com/facebook-partner-apps-privacy-957694/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	



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1108	n/a	2/22/2019	New Orleans City Business, Report: Apps give Facebook sensitive health and other data, available at <a href="https://neworleanscitybusiness.com/blog/2019/02/22/report-apps-give-facebook-sensitive-health-and-other-data/">https://neworleanscitybusiness.com/blog/2019/02/22/report-apps-give-facebook-sensitive-health-and-other-data/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1109	n/a	2/22/2019	9To5Mac, Popular apps caught secretly sending health data and more to Facebook, should Apple intervene?, available at <a href="https://9to5mac.com/2019/02/22/facebook-personal-data-ios-apps/">https://9to5mac.com/2019/02/22/facebook-personal-data-ios-apps/</a>	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
1110	n/a	n/a	S. Wellman Poshmark Site	n/a			S. Wellman				-	
1111	n/a	n/a	T. Gamino Threads Post	n/a			T. Gamino		Authenticity	Authenticity to be established by testimony from Tesha Gamino.	-	
1112	n/a	n/a	Docket, Gamino v. Thinx Inc.	n/a			T. Gamino		Not relevant to any claim or defense	Relevant to witness credibility.	-	
1113	n/a	1/22/2024	Complaint, Gamino v. Thinx Inc.	n/a			T. Gamino		Not relevant to any claim or defense; outside class period	Relevant to witness credibility, even if outside class period.	-	
1114	n/a	5/16/2024	Answer, Gamino v. Thinx Inc.	n/a			T. Gamino		Not relevant to any claim or defense; outside class period	Relevant to witness credibility, even if outside class period.	-	
1115	n/a	n/a	Docket, Gamino v. Spin Master Inc. and the Maya Group	n/a			T. Gamino		Not relevant to any claim or defense	Relevant to witness credibility.	-	
1116	n/a	10/31/2023	Complaint, Gamino v. Spin Master Inc. and the Maya Group	n/a			T. Gamino		Not relevant to any claim or defense; outside class period	Relevant to witness credibility, even if outside class period.	-	
1117	n/a	n/a	Docket, Gamino v. Google LLC	n/a			T. Gamino		Not relevant to any claim or defense	Relevant to witness credibility.	-	
1118	n/a	4/9/2024	Complaint, Gamino v. Google LLC	n/a			T. Gamino		Not relevant to any claim or defense; outside class period	Relevant to witness credibility, even if outside class period.	-	
1119	n/a	3/18/2025	Mya Abraham, "Sarunas Jackson Breaks Silence on Abuse Claims From Ex-Girlfriend," VIBE	n/a			T. Gamino		Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to witness credibility and CIPA 632 claim, even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
1120	n/a	3/16/2025	Xaviera Bryant, "Not Again?! Sarunas Jackson Accused Of Abuse & Toxic Behavior By His Ex-Girlfriend Brittney Bell," Ice Cream Conversations	n/a			T. Gamino		Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to witness credibility and CIPA 632 claim, even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
1121	n/a	3/16/2025	Sarunas Jackson Accused Of Abuse & Cheating, Baby Mama DomiNque Perry Co-Signs His Ex-Girlfriend & Claims 'Insecure' Actor Mocked Their Daughter's Autism	n/a			T. Gamino		Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to witness credibility and CIPA 632 claim, even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
1122	n/a	n/a	Docket, Gamino v. Jones	n/a			T. Gamino		Not relevant to any claim or defense	Relevant to witness credibility.	-	
1123	n/a	5/18/2023	Complaint, Gamino v. Jones	n/a			T. Gamino		Not relevant to any claim or defense; outside class period	Relevant to witness credibility, even if outside class period.	-	
1124	n/a	1/12/2024	Court Order, Gamino v. Jones	n/a			T. Gamino		Not relevant to any claim or defense; outside class period	Relevant to witness credibility, even if outside class period.	-	

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1125	META-FRASCO-0000000001 through META-FRASCO-0000000003	6/9/2016	Facebook Offline Conversions Beta Terms, date of last revision June 9, 2016	Confidential								
1126	META-FRASCO-0000000007 through META-FRASCO-0000000009	4/17/2017	Facebook Offline Conversions, date of last revision April 17, 2017	Confidential								
1127	META-FRASCO-0000000013 through META-FRASCO-0000000015	9/29/2017	Facebook Offline Conversions, date of last revision September 29, 2017	Confidential								
1128	META-FRASCO-0000002944 through META-FRASCO-0000002946	4/8/2019	Facebook Business Tools Terms, date of last revision April 8, 2017	Confidential								
1129	META-FRASCO-0000002947 through META-FRASCO-0000002949	12/26/2019	Facebook Business Tools Terms, date of last revision December 26, 2019	Confidential								
1130	META-FRASCO-0000000962 through META-FRASCO-0000000966	1/30/2015	Facebook Data Policy, date of last revision January 30, 2015	Confidential								
1131	META-FRASCO-0000000967 through META-FRASCO-0000000971	9/29/2016	Facebook Data Policy, date of last revision September 29, 2016	Confidential								
1132	META-FRASCO-0000003245 through META-FRASCO-0000003253	9/21/2020	Instagram Data Policy, date of last revision August 21, 2020	Confidential								
1133	META-FRASCO-0000003254 through META-FRASCO-0000003261	1/11/2021	Instagram Data Policy, date of last revision January 11, 2021	Confidential								
1134	META-FRASCO-0000000687 through META-FRASCO-0000000692	1/30/2015	Facebook Statement of Rights and Responsibilities, date of last revision January 30, 2015	Confidential								
1135	META-FRASCO-0000000693 through META-FRASCO-0000000670	4/19/2018	Facebook Terms of Service, date of last revision April 19, 2018	Confidential								
1136	META-FRASCO-0000002586 through META-FRASCO-0000002593	7/31/2019	Facebook Terms of Service, date of last revision July 31, 2019	Confidential								
1137	META-FRASCO-0000002563 through META-FRASCO-0000002571	10/1/2020	Facebook Terms of Service, date of last revision October 1, 2020	Confidential								
1138	GOOG-FLO-00020220		[GA4] Activate Google signals for Google Analytics 4 propertiesGoogle Signals				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1139	GOOG-FLO-00020185		[GA4] Data Collection				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1140	GOOG-FLO-00020063		Linking Google Ads and Analytics				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1141	GOOG-FLO-00020187	2022	[GA4] Set up Analytics for a website and/or app				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1142	GOOG-FLO-00000001		About the ad review process				O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1143	GOOG-FLO-00073218		Modify and create events				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1144	GOOG-FLO-00073263		Set up data collection for an app				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1145	GOOG-FLO-00019754	1/27/2016	Answers Agreement				K. Lam	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	

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1146	GOOG-FLO-00069181	2021	Data Sharing Settings				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1147	GOOG-FLO-00069153		Firebase - Data-Sharing Settings				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1148	GOOG-FLO-00057727	9/30/2019	Email with subject line: [Please Read] Fabric Deprecation MSA set for Wed 10/2 10am est	HC-AEO			K. Lam	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1149	GOOG-FLO-00000060		Fabric Data Processing and Security Terms				K. Lam	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1150	GOOG-FLO-00078882		Analytics Settings - Firebase				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1151	GOOG-FLO-00065530		Firebase Help - Automatically Collected Events				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1152	GOOG-FLO-00078907		Firebase - How to Control Advertising Personalization				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1153	GOOG-FLO-00065468	11/17/2020	Google Analytics				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1154	GOOG-FLO-00065470	1/20/2021	Log Events				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1155	FLO-00002816	12/16/2016	Flo Privacy Policy (archived), effective as of December 21, 2016				S. Schumacher	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1156	FLO-00002942	3/14/2017	Flo Health Privacy Policy 3-14-2017				S. Schumacher	Relevant to defending Plaintiffs' CIPA 632 claim	Duplicative of FLO-00000183-00000185		-	
1157	GOOG-FLO-00020419		GA Data Retention				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1158	GOOG-FLO-00069055		Data Retention - Analytics Help				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1159	GOOG-FLO-00078886		Data Retention Help Center				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1160	GOOG-FLO-00065573		Data Collection - Firebase Help Page				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1161	GOOG-FLO-00000132		Google Ads Policies				O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1162	GOOG-FLO-00037744		Google Analytics				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1163	GOOG-FLO-00066082	9/12/2019	Policy requirements for Google Analytics Advertising Features				O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1164	GOOG-FLO-00078821		[GA4] Automatically Collected Events				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1165	GOOG-FLO-00019961		GA - Best Practices to Avoid Sending PII				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1166	GOOG-FLO-00019479	1/22/2019	Google Privacy Policy (1/22/2019 Version)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1167		10/2/2017	Google Privacy Policy (10/2/2017 Version)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Authenticity		-	
1168	GOOG-FLO-00019545	4/17/2017	Google Privacy Policy (4/17/2017)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1169	GOOG-FLO-00078860	1/27/2017	[GA4] Exclude specific events and user-scoped custom dimensions from ads personalization				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1170	GOOG-FLO-00078941		GOOG-FLO-00078941				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1171	GOOG-FLO-00000147	1/27/2017	GOOG-FLO-00000147				K. Lam	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1172	GOOG-FLO-00064216	8/24/2022	GOOG-FLO-00064216 (HC-AEO)	HC-AEO			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1173	GOOG-FLO-00090410		GOOG-FLO-00090410	HC-AEO			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1174	GOOG-FLO-00093786	12/5/2020	GOOG-FLO-00093786				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1175	GOOG-FLO-00000191	5/18/2016	Google Analytics for Firebase Terms of Service (5/18/2016 Version)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1176	GOOG-FLO-00000205		Firebase Analytics Use Policy (5/18/2016 Version)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1177	GOOG-FLO-00065818		GOOG-FLO-00065818				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1178	GOOG-FLO-00078883		GOOG-FLO-00078883				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	

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1179	GOOG-FLO-00000161	4/17/2019	GOOG-FLO-00000161				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1180	GOOG-FLO-00000181	5/17/2017	GOOG-FLO-00000181				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1181	GOOG-FLO-00000171	10/1/2018	GOOG-FLO-00000171				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1182	GOOG-FLO-00000203	5/17/2017	GOOG-FLO-00000203				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Duplicative; already at GOOG-FLO-00000181		-	
1183	GOOG-FLO-00089138		GOOG-FLO-00089138 (HC-AEO)	HC-AEO			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1184	GOOG-FLO-00000143		GOOG-FLO-00000143				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1185	GOOG-FLO-00078862		GOOG-FLO-00078862				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1186	GOOG-FLO-00000122		GOOG-FLO-00000122				O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1187	GOOG-FLO-00089090		GOOG-FLO-00089090	HC-AEO			O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1188	GOOG-FLO-00078898		Firebase - Data-sharing settings GOOG-FLO-00078898				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1189	GOOG-FLO-00076256	6/11/2019	GOOG-FLO-00076256				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1190	GOOG-FLO-00076259	6/11/2019	GOOG-FLO-00076259				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1191		1/2/2023	2023-01-02 Jennifer Chen_s Amended Responses to RFA (Set 1)	Confidential			J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1192		1/19/2023	2023-01-19 Sarah Wellman's R&Os to Googles ROGs				S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1193		1/2/2023	2023-01-02 Sarah Wellman_s Amended Responses to RFA (Set 1)	Confidential			S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1194		1/2/2023	2023-01-02 Tesha Gamino_s Amended Responses to RFA (Set 1)	Confidential			T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1195		1/9/2023	2023-01-09 Tesha Gamino's R&Os to Google's ROGs - Set 1				T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1196	GOOG-FLO-00078868	2022	GOOG-FLO-00078868				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1197	GOOG-FLO-00077991	6/1/2018	Firebase Event Names Doc - GOOG-FLO-00077991	HC-AEO			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1198	GOOG-FLO-000378908	11/8/2022	GOOG-FLO-000378908				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1199			[GA4] Demo account				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Rule 901 - authenticity not established			
1200			FloodIt Demo				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Rule 901 - authenticity not established			
1201	GOOG-FLO-00019562	8/29/2016	Google Privacy Policy (8/29/2016 Version) - Ex. 28				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1202	GOOG-FLO-00019535	12/18/2017	Google Privacy Policy (12/18/2017 Version)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1203	GOOG-FLO-00000069		Privacy and Terms page (GOOG-FLO-00000069)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1204	GOOG-FLO-00000074		Health/medicine advertising help page (GOOG-FLO-00000074)				O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1205	GOOG-FLO-000911005	9/11/2018	GOOG-FLO-000911005				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1206	GOOG-FLO-00020216		GOOG-FLO-00020216				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1207	GOOG-FLO-00057427	6/25/2019	Firebase S2S Instead of SDK - GOOG-FLO-00057427				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1208		3/2/2021	Class Action Complaint (Chen Complaint) filed on March 2, 2021				J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1209		2/12/2021	Class Action Complaint (Wellman Complaint) filed on February 12, 2021				S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1210		9/2/2021	Consolidated Class Action Complaint (ECF No. 64) filed on September 2, 2021				J. Chen S. Wellman T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim	-			

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1211		2/3/2021	Class Action Complaint (Gamino Complaint) filed on February 3, 2021				T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1212	GOOG-FLO-00073191		GOOG-FLO-00073191				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1213			Demo Account in Google Analytics (https://www.youtube.com/watch?v=h9bqUZP6AB0)				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Rule 901 - authenticity not established			
1214			Google Analytics FloodIt! Demo, available to jurors via laptop.				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Rule 901 - authenticity not established			
1215	FLO-00098124	3/2/2023	Max Scrobov Depo Tr Vol. 1 - Ex. 170 (HC-AEO)	Confidential							-	
1216	GOOG-FLO-00019788		GOOG-FLO-00019788								-	
1217		9/14/22	Roman Bugaev Depo Tr Vol. 1 - Ex. 119								-	
1218		3/1/2023	Susanne Schumacher Depo Tr Vol. 1 - Ex. 146 (HC-AEO)	HC-AEO							-	